



Acushnet Nursing Home Inc.

Outfall 001

Goodyear Tire + Rubber

001

cooling water, storm water

Tilcon Massachusetts, Inc.

001, 002

waste storage basins

Revere Copper Products, Inc.

002, 002A, 004B, 004C

metal finishing, cooling water

Town of Fitchburg

001

WWTP

Skipp - Motor Inn, Inc.

001

Teledyne Rodney Metals

001

annealing of stainless steel strip - uncontaminated cooling water

Acushnet Co., Golf Division

008

golf ball manufacture - process water, non-contact cooling, sanitary waste

Glen Petroleum Corp.

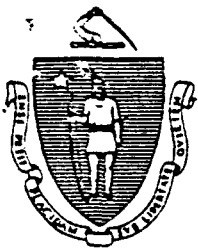
001

restrooms only

New Bedford

61753

Linn + Associates
264.331



S. RUSSELL SYLVA
Commissioner

The Commonwealth of Massachusetts

*Executive Office of Environmental Affairs
Department of Environmental Quality Engineering
Division of Water Pollution Control*

*Technical Services Branch
Westview Building, Lyman School
Westborough, MA 01581*

February 5, 1987

Tony Depalma
EPA, WCC-2130
JFK Federal Building
Boston, MA 02108

Dear Mr. Depalma:

A sampling survey was conducted on October 14-16, 1986 by the Technical Services Branch of discharges along the Acushnet River. This survey was part of the 1986 Buzzards Bay Program coordinated by Lawrence Gil. Enclosed you will find a copy of the assessment of laboratory analysis and summary of permit violations sent to Phil Ripa in the Southeast Region of the Division.

The results of this survey can be obtained from the Westborough office. If you have any questions, or would like further information, please call me at (617) 366-9181.

Sincerely,

A handwritten signature in cursive script that reads "Catherine O'Riordan".

Catherine O'Riordan
Assistant Sanitary Engineer

CO:djm
Enclosure

cc: A. Cooperman
R. Kubit
P. Hogan
L. Gil

RECEIVED

FEB 17 1987

COMPLIANCE BRANCH

MEMORANDUM

RECEIVED

FEB 17 1987

TO: Phil Ripa, Associate Sanitary Engineer, SERO, Lakeville, Mass.
FROM: Catherine O'Riordan, Assistant Sanitary Engineer, New Bedford, Mass.
Westborough
DATE: January 29, 1987
SUBJECT: Water Quality Survey of Acushnet River, New Bedford - Results of Laboratory Analysis

COMPLIANCE BRANCH

Sampling was conducted at four NPDES permitted discharges on the Acushnet River on October 14-16, 1986. During this period samples were also obtained from the Hurricane Dike and from the CSO's at Sawyer Street and Merrimac Street. Enclosed are the results of laboratory analysis.

Permitted discharges sampled include the Fairhaven and New Bedford Wastewater Treatment Facilities, Revere Copper Products, and the Acushnet Company, Golf Division. Twenty-four hour flow composite samples were taken using ISCO 1680 automatic samplers. Composite samples were tested for BOD, suspended solids, settleable solids, nutrients, and metals. Grab samples were taken for fecal coliform, pH, chlorine residual, oil and grease, and volatile organic acids (VOA). Note that samples collected on October 15 were not delivered to the lab until October 16.

Following is a summary of field observations and noted permit violations at each sampling station.

Fairhaven Wastewater Treatment Plant - Although this facility has no permit limit for ammonia, samples showed high levels (11 mg/l) during this sampling period. Coliform counts were also high, however, chlorination requirements are seasonal and are not in effect after October 15. VOA analysis showed the presence of methyl tertbutyl ether both days (18 and 19 ug/l) as well as chloroform (2.8 ug/l) and methylene chloride (1.3 ug/l). Due to equipment problems, samples obtained on October 16, 1986 were grab samples. Effluent appeared only slightly turbid.

New Bedford Wastewater Treatment Plant - All samples taken at New Bedford Wastewater Treatment Plant were grab samples. Effluent on both days was very turbid and a grey-purple color, with a strong odor. All of the parameters tested far exceeded their permit limits. On October 15, BOD was 159 mg/l; total suspended solids 142 mg/l; settleable solids 5.5 mg/l; and ammonia 8.1 mg/l. Effluent looked oily and foamy and showed oil and grease of 22 mg/l. VOA analysis showed total organics of 1013 ug/l on October 15 and 813 ug/l on October 16. These included chloroform, 1,1,1-trichloroethylene, toluene, ethyl benzene and xylenes.

It was observed that the primary clarifiers were exposed to the wind, preventing proper solids and scum removal. A high level of chloride (1,750 mg/l) was noted on October 15, indicating salt water intrusion.

Revere Copper Products - The effluent from outfall 002 appeared clear both days with little or no oil floating on the surface. VOA analysis showed presence of five different organic acids including methylene chloride, chloroform, and acetone (47 ug/l). Other parameters were within proposed permit limits (draft permit 11/86).

Grab samples were taken at outfall 004C and tested for oil and grease. This discharge consists of wastewater from the Gale oil separator as well as raw sanitary wastewater. The draft permit requires that this discharge be tied into the municipal sewer after completion of the sewer extension. As of this time, the city has not made any plans for this sewer extension, and raw wastewater continues to flow into the river.

Acushnet Company, Golf Division - During this sampling period, the effluent appeared slightly turbid, and was a white color. All parameters were within proposed permit limits (draft permit 8/86). VOA analysis showed high levels of trichlorotrifluoroethane (820 ug/l) and chloroform (22 ug/l). Total organics on October 15 were 853 ug/l and on October 16, 55 ug/l.

Sampling was also conducted at two COS's on October 14, 15 and 16 during low tide. Grab samples were tested for fecal and total coliform, BOD, suspended solids, settleable solids, nutrients, metals, oil and grease, PCB's and volatile organic acids (VOA). Rainfall during this sampling period was measured to be 1" on October 14 and 1/10" on October 16. Rainfall was measured at the weather station at Hurricane Dike.

Merrimac Street CSO - According to the 1983 Interim Summary Report on CSO's by CDM, this outfall is not connected to the interceptor system. It is a direct dry weather discharge with an average flow of 0.03 MGD. This discharge was sampled on October 14 and October 15 only. Laboratory analysis shows high total and fecal coliform counts on both days (total coliform, 430,000/100 ml and 10,000/100 ml; and fecal coliform 43,000/100 ml and 1,300/100 ml). Total suspended solids were also high on October 14 (17 mg/l). Values for BOD, ammonia, total phosphorus, and total suspended solids are lower on October 15 than the values for these parameters on October 14. This could indicate I/I problems in the sewer lines connected to this discharge.

VOA analysis showed presence of trichloroethylene both days (7.2 ug/l and 4.5 ug/l). PCB, Aroclor 1254 was found on October 14 at 0.48 ug/l, possibly washed through the system after the rainfall.

Sawyer Street CSO - In the 1983 Interim Summary Report on CSO's, the Sawyer Street CSO is classified as a wet weather discharge only. However, during the October sampling period, flow was observed from

this discharge all three days at low tide. Flow was estimated on October 16 at 0.2 cubic feet/second. Although rain did occur two days prior to this observation, flow at this rate may indicate a dry weather discharge.

Results of laboratory analysis for several parameters are summarized below.

Sawyer Street CSO

	10/14	10/15	10/16
BOD	16	135	147
Total Suspended Solids	5	67	92
Ammonia	4.4	6.7	6.4
Total Phosphorus	5.2	15	—
Fecal Coliform/100 ml	2.4X10 ⁶	4.3X10 ⁶	2.4X10 ⁶
Oil and Grease	11	33	—
Chloride	42	1,025	115

(All units mg/l unless otherwise noted)

In addition, VOA analysis shows high total organics each day. Organics present include acetone (310 ug/l), chloroform, methyl ethyl ketone, trichloroethylene, toluene, and xylenes. These data indicate industrial connections, as well as sanitary connections to the sewer lines feeding this discharge.

Also observed at this discharge were plumes of various colors (dyes) during low tide sampling. Because of the continuous flow and high level of contaminants from this discharge, further investigation is recommended to determine the cause of this overflow.

Hurricane Dike - Sampling was conducted at the opening of the dike. Composite samples were obtained of the outgoing tide using ISCO 1680 automatic samplers. Laboratory analysis showed levels of total coliform (2,300/100 ml on October 14 and 6,200/100 ml on October 15), and fecal coliform (80/100 ml on October 14 and 180/100 ml on October 15).

CO/ac

cc: Larry Gil, DWPC, Westborough
Alan Cooperman, DWPC, Westborough
Robert Kubit, DWPC, Westborough
Glen Gilmore, DWPC, Boston
Brian Jeans, Construction Grants, Boston
Paul Taurasi, Construction Grants, Boston
Bill Gaughan, DWPC, Boston
Peter Dore, DWPC, Boston
Joseph Durant, DWPC, Boston

Federal Permit No. MA0026280
State Permit No. 660
State Application No. 1001

**AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM**

*CIS. v. AVX Original
Litigation Document*

In compliance with the provisions of the Federal Water Pollution Control Act, as amended.
(33 U.S.C. 1251 et. seq; the "Act"), and the Massachusetts Clean Waters Act, as
amended, (M.G.L., C.21, §§26-53),

Acushnet Nursing Home, Inc.

is authorized to discharge from a facility located at

127 South Main Street
Acushnet, MA

to receiving waters named

Acushnet River

in accordance with effluent limitations, monitoring requirements and other conditions set forth
in Parts I, II, and III hereof.

This permit shall become effective ~~on~~ 45 days from date of signature.

This permit and the authorization to discharge shall expire at midnight, April 30, 1983.

Signed this 24 day of March, 1978.



Leslie Carothers

Leslie Carothers, Director
Enforcement Division
Environmental Protection Agency



Thomas C. McMahon
Thomas C. McMahon, Director
Division of Water Pollution Control
Commonwealth of Massachusetts

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning effective date and lasting through expiration date
the permittee is authorized to discharge from outfall(s) serial number(s) 001

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kg/day (lbs/day)		Other Units (Specify)		Measurement Frequency	Sample Type *
	Monthly Avg	Daily Max	Monthly Avg	Daily Max		
Flow—m ³ /Day (GPD)	—	—	4.5(1200)	5.7(1500)	quarterly	total daily
BOD	—	—	30 mg/l	50 mg/l	quarterly	8-hr. composite
TSS	—	—	30 mg/l	50 mg/l	quarterly	8-hr. composite
Settleable Solids	—	—	0.1 ml/l	0.3 ml/l	quarterly	grab
Cl ₂	—	—	—	2.0 mg/l	daily	grab
Fecal Coliform	—	—	200/100ml	400/100ml	monitoring not required	
Total Coliform	—	—	1,000/100ml	2,000/100ml	monthly	grab

*Samples shall be taken during the period Monday thru Friday between 6 a.m. & 6 p.m.

The pH shall not be less than 6.0 standard units nor greater than 8.5 standard units and shall be monitored monthly.
Report range of 4 grabs.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):
sanitary treatment facility outfall.

The discharge shall not cause a violation of the water quality standards of the receiving waters.

B. MONITORING AND REPORTING**1. Representative Sampling**

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. Reporting

Monitoring results obtained during the previous 6 months shall be summarized semiannually & reported on a Discharge Monitoring Report Form (OMB#158-R0073), postmarked no later than the 28th day of the month following the completed reporting period. The first report is due on July 28, 1978*. Duplicate signed copies of these, and all other reports required herein, shall be submitted to the Regional Administrator and the State at the following addresses:

Environmental Protection Agency
Region I - Permits Branch
P.O. Box 8127
Boston, MA 02114

Massachusetts Division of Water
Pollution Control
Southeast Regional Office
P.O. Box 537
North Pembroke, MA 02358

*Subsequent reports due January 28 & July 28 each year.

3. Definitions

See attached sheets.

~~a. The "daily average" discharge means the total discharge by weight during a calendar month divided by the number of days in the month that the production or commercial facility was operating. Where less than daily sampling is required by this permit, the daily average discharge shall be determined by the summation of all the measured daily discharges by weight divided by the number of days during the calendar month when the measurements were made.~~

~~b. The "daily maximum" discharge means the total discharge by weight during any calendar day.~~

4. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act, under which such procedures may be required.

5. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The exact place, date, and time of sampling;
- b. The dates the analyses were performed;
- c. The person(s) who performed the analyses;

PART I

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Permit No. MA0026280

d. The analytical techniques or methods used; and

e. The results of all required analyses.

6. *Additional Monitoring by Permittee*

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report Form (OMB#158-R0073). Such increased frequency shall also be indicated.

7. *Records Retention*

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the State water pollution control agency.

PART II

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A. MANAGEMENT REQUIREMENTS

1. *Change in Discharge*

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions, production increases, or process modifications which will result in new, different, or increased discharges of pollutants must be reported by submission of a new NPDES application or, if such changes will not violate the effluent limitations specified in this permit, by notice to the permit issuing authority of such changes. Following such notice, the permit may be modified to specify and limit any pollutants not previously limited.

2. *Noncompliance Notification*

If, for any reason, the permittee does not comply with or will be unable to comply with any daily maximum effluent limitation specified in this permit, the permittee shall provide the Regional Administrator and the State with the following information, in writing, within five (5) days of becoming aware of such condition:

- a. A description of the discharge and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

3. *Facilities Operation*

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

4. *Adverse Impact*

The permittee shall take all reasonable steps to minimize any adverse impact to navigable waters resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

5. *Bypassing*

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except (i) where unavoidable to prevent loss of life or severe property damage, or (ii) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the effluent limitations and prohibitions of this permit. The permittee shall promptly notify the Regional Administrator and the State in writing of each such diversion or bypass.

PART II

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6. *Removed Substances*

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering navigable waters.

7. *Power Failures*

In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

- a. In accordance with the Schedule of Compliance contained in Part I, provide an alternative power source sufficient to operate the wastewater control facilities;
- or, if such alternative power source is not in existence, and no date for its implementation appears in Part I,
- b. Halt, reduce or otherwise control production and/or all discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

B. RESPONSIBILITIES

1. *Right of Entry*

The permittee shall allow the head of the State water pollution control agency, the Regional Administrator, and/or their authorized representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any discharge of pollutants.

2. *Transfer of Ownership or Control*

In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Regional Administrator and the State water pollution control agency.

3. *Availability of Reports*

Except for data determined to be confidential under Section 308 of the Act, all reports prepared in accordance with the terms of this permit shall be available for public

PART II

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inspection at the offices of the State water pollution control agency and the Regional Administrator. As required by the Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Act.

4. Permit Modification

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

- a. Violation of any terms or conditions of this permit;
- b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. Toxic Pollutants

Notwithstanding Part II, B-4 above, if a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the Act for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the permittee so notified.

6. Civil and Criminal Liability

Except as provided in permit conditions on "Bypassing" (Part II, A-5) and "Power Failures" (Part II, A-7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

7. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Act.

8. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Act.

PART II

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Permit No. MA0026280

9. *Property Rights*

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

10. *Severability*

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

PART III

OTHER REQUIREMENTS

FOR PURPOSES OF THIS PERMIT, THE FOLLOWING TERMS SHALL APPLY.

Monthly Average - The mean value of the analyses of the total number of samples collected during a month.

Daily Maximum - The maximum value of any one grab sample collected in a normal operating day.

Grab Sample - An individual sample collected in a period of less than 15 minutes.

Composite Sample - A sample consisting of a minimum of eight grab samples collected at regular intervals over a normal operating day and combined proportional to flow, or a sample continuously collected proportional to flow over a normal operating day.

Implementation Schedule - An abatement program consisting of:

a. A plan of intended design, construction, and operation of new or modified facilities to treat the effluent; and

b. A timetable setting forth the dates by which all sources of water pollution must be in compliance with the effluent limitations of this permit. This schedule shall include (if appropriate) interim and final dates to accomplish:

- (1) Completion of preliminary plans and engineering report
- (2) Completion of final plans
- (3) Contract award
- (4) Commencement of construction
- (5) Completion of construction and commencement of operation
- (6) Attainment of operational level

The following abbreviations, when used, are defined below.

mg/l	milligrams per liter
ug/l	micrograms per liter
lbs/day	pounds per day
kg/day	kilograms per day
Temp. °C	temperature in degrees Centigrade
Temp. °F	temperature in degrees Fahrenheit
Turb.	turbidity measured in Jackson Candle Units (JTU)

TNFR or TSS	total nonfilterable residue or total suspended solids
BOD	five-day biochemical oxygen demand unless otherwise specified
TKN	total Kjeldahl nitrogen as nitrogen
NH ₃ -N	ammonia nitrogen as nitrogen
Total P	total phosphorus as phosphorus
COD	chemical oxygen demand
TOC	total organic carbon
Surfactant	surface-active agent
pH	a measure of the hydrogen ion concentration
PCB	polychlorinated biphenyl
m ³ /Day	cubic meters per day
MGD	million gallons per day
Oil & Grease	hexane extractable material
Total Coliform	total coliform bacteria
Fecal Coliform	total fecal coliform bacteria
ml	milliliter(s)
ml/l	milliliter(s) per liter
SU	standard units
NO ₃ -N	nitrate nitrogen as nitrogen
NO ₂ -N	nitrite nitrogen as nitrogen
NO ₂ & NO ₃	combined nitrite and nitrate nitrogen as nitrogen
Cl ₂	total residual chlorine

AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Clean Water Act, as amended, (33 U.S.C. §§1251 et seq.; the "CWA"), and the Massachusetts Clean Waters Act, as amended, (M.G.L. Chap. 21, §§26-53),

~~Goodyear Tire and Rubber~~

is authorized to discharge from the facility located at

545 Orchard St.
New Bedford, MA

to receiving waters named

Buzzards Bay via Clark's Cove

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

This permit shall become effective on date of signature.

This permit and the authorization to discharge expire at midnight, five years after the effective date.

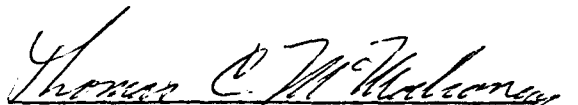
This permit supersedes the permit issued on August 14, 1975.

This permit consists of 5 pages in Part I including effluent limitations, monitoring requirements, etc., and 19 pages in Part II including General Conditions and Definitions.

Signed this 5th day of August, 1986



Director
Water Management Division
Environmental Protection Agency
Region I
Boston, MA



Director, Division of Water
Pollution Control
Department of Environmental
Quality Engineering
Commonwealth of Massachusetts
Boston, MA

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 001: Non-contact cooling water and stormwater.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Avg. Monthly</u>	<u>Max. Daily</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Total Daily Flow	-	.50 mgd	1/Month	Estimate
Temperature	-	80°F	1/Month	Grab
TSS	-	10 mg/l	1/Month	Composite
Oil and Grease	-	5 mg/l	1/Month	Grab
COD	-	-	1/Quarter	Composite

Samples for all pollutants except COD shall normally be collected during non-stormwater runoff periods. However, one monthly sample per quarter shall be collected during a stormwater runoff event, within one hour after initiation of the runoff event. The COD samples shall be collected during stormwater runoff events only.

The pH shall not be less than 6.5 standard units nor greater than 8.0 standard units except when due to intake pH and shall be monitored three times per month. Report range of four grabs for each monitoring occasion.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: manhole to building drain to 18 inch storm sewer on Orchard Street.

2. All existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Director as soon as they know or have reason to believe:

- a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) One hundred micrograms per liter (100 ug/l);
 - (2) Two hundred micrograms per liter (200 ug/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 ug/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;
 - (3) Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 C.F.R. §122.21(g)(7); or
 - (4) Any other notification level established by the Director in accordance with 40 C.F.R. §122.44(f).
- b. That any activity has occurred or will occur which would result in the discharge, on a non-routine or infrequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) Five hundred micrograms per liter (500 ug/l);
 - (2) One milligram per liter (1 mg/l) for antimony;
 - (3) Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 C.F.R. §122.21(g)(7); or
 - (4) Any other notification level established by the Director in accordance with 40 C.F.R. §122.44(f).
- c. That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the permit application.

B. MONITORING AND REPORTING

Monitoring results obtained during the previous quarter shall be summarized for each quarter and reported on separate Discharge Monitoring Report Forms postmarked no later than the 15th day of the month following the completed reporting period. The first report is due on the 15th day of the month following the first full quarter after the effective date of the permit.

Duplicate signed copies of these, and all other reports required herein, shall be submitted to the Director and the State at the following address:

Permit Compliance Section
Compliance Branch
Water Management Division
Environmental Protection Agency
JFK Federal Building
Boston, MA 02203

The State Agency is:

Massachusetts Department of Environmental Quality Engineering
Massachusetts Division of Water Pollution Control
Southeastern Regional Office
Lakeville Hospital
Lakeville, Massachusetts 02346

Signed copies of all other notifications and reports required by this permit shall be submitted to the State at:

Massachusetts Department of Environmental Quality Engineering
Massachusetts Division of Water Pollution Control
Regulatory Branch
1 Winter Street
Boston, Massachusetts 02108

C. STATE PERMIT CONDITIONS

This Discharge Permit is issued jointly by the U. S. Environmental Protection Agency and the Division of Water Pollution Control under Federal and State law, respectively. As such, all the terms and conditions of this permit are hereby incorporated into and constitute a discharge permit issued by the Director of the Massachusetts Division of Water Pollution Control pursuant to M.G.L. Chap. 21, §43.

Each Agency shall have the independent right to enforce the terms and conditions of this Permit. Any modification, suspension or revocation of this Permit shall be effective only with respect to the Agency taking such action, and shall not affect the validity or status of this Permit as issued by the other Agency, unless and until each Agency has concurred in writing with such modification, suspension or revocation. In the event any portion of this Permit is declared, invalid, illegal or otherwise issued in violation of State law such permit shall remain in full force and effect under Federal law as an NPDES Permit issued by the U. S. Environmental Protection Agency. In the event this Permit is declared invalid, illegal or otherwise issued in violation of Federal law, this Permit shall remain in full force and effect under State law as a Permit issued by the Commonwealth of Massachusetts.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203

FACT SHEET

DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
PERMIT TO DISCHARGE TO WATERS OF THE UNITED STATES

NPDES PERMIT NO.: MA0005606

STATE PERMIT NO.: 450

NAME AND ADDRESS OF APPLICANT:

Goodyear Tire and Rubber Co.
545 Orchard Street
New Bedford, MA 02744

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

Goodyear Tire and Rubber Co.
545 Orchard Street
New Bedford, MA 02744

RECEIVING WATER: Buzzards Bay via Clark's Cove

CLASSIFICATION: SA

I. Proposed Action, Type of Facility, and Discharge Location.

The above named applicant has applied to the U.S. Environmental Protection Agency for renewal of its NPDES permit to discharge into the designated receiving water. The facility is a manufacturer of roofing products, graphic products, air sleeves and special products. The discharge is from non-contact cooling water and stormwater.

II. Description of Discharge.

A quantitative description of the discharge in terms of significant effluent parameters based on the renewal application and DMR data is shown on Attachment A.

III. Limitations and Conditions.

The effluent limitations of the draft permit and the monitoring requirements may be found on Attachment B.

IV. Permit Basis and Explanation of Effluent Limitation Derivation.

The Goodyear Tire and Rubber plant in New Bedford, MA was issued an NPDES permit in August 1975 to discharge up to 1.2 mgd of cooling water and stormwater to a municipal stormdrain leading to Clark's Cove, a Class SA inlet of Buzzards Bay. Initially, the permit included some contact water. The original permit called for house-keeping and piping changes to remove trace contaminants from the cooling water so that the permit limits of 10 mg/l and 5 mg/l maximum daily TSS, and Oil & Grease could be met. The Company submitted a permit renewal application in 1980. That application was supplemented in 1985. A review of the 1984-85 DMR data show that the discharge has consistently met the permit limits. DMR data are summarized in Attachment A.

The Clean Water Act (CWA) requires that the effluent of point source discharges satisfy minimum technology and water quality requirements. Section 301(b)(2)(A) and (E) of the CWA provides that by July 1, 1984, industry must meet limitations based on Best Available Technology Economically Achievable (BAT) for toxic pollutants and Best Conventional Pollutant Control Technology (BCT) for conventional pollutants (BOD, TSS, pH, Oil & Grease, and Fecal Coliform). Section 301(b)(1)(c) of the CWA requires that effluent limitations based on water quality considerations be established for point source discharges when such limitations are necessary to meet state or federal water quality standards that are applicable to the designated receiving water. This is necessary when technology based limitations would interfere with the attainment or maintenance of water quality in the receiving water.

No national effluent limitation guidelines have been proposed or promulgated for a discharge of the type under consideration here. Therefore, the proposed technology based limitations have been developed using Best Professional Judgement pursuant to Section 402(a)(1) of the CWA. EPA has determined that the proposed limitations meet the technology (BAT, BCT) and the water quality requirements of the Act.

The receiving water, Clark's Cove has been designated Class SA, the highest marine water quality class designation issued by the State. Hence any discharges allowed to Clark's Cove must be carefully limited and monitored.

The new permit decreases the maximum daily flow limit in the expiring permit from 1.2 to 0.5 mgd consistent with the permittee's request via the 1985 supplemental renewal application. The maximum daily temperature, TSS and Oil and Grease limits of 80°F, 10 mg/l and 5

mg/l from the old permit are continued in the new permit consistent with EPA's anti-backsliding regulations, 40 CFR 122.62 (1). These limits are applicable to non-stormwater runoff periods. The pH limits of 6.5 to 8.0 are also continued from the prior permit. A new monitoring requirement for COD has been added in the new permit. The COD sample is to be collected once each quarter during a rain-fall event. The intension of this new requirement is to provide an indication of the quality of the roof and parking area runoff in light of the possibility of contamination by manufacturing activities at the plant.

The effluent monitoring requirements have been established to yield data representative of the discharge by authority of Section 308 (a) of the CWA in accordance with 40CFR122.41(j), 122.44, and 122.48. The monitoring frequency proposed is the minimum allowed for individual permits in Massachusetts.

V. State Certification Requirements.

EPA may not issue a permit unless the State Water Pollution Control Agency with jurisdiction over the receiving waters certifies that the effluent limitations contained in the permit are stringent enough to assure that the discharge will not cause the receiving water to violate State Water Quality Standards. The staff of the Massachusetts Division of Water Pollution Control has reviewed the draft permit and advised EPA that the limitations are adequate to protect water quality. EPA has requested permit certification by the State and expects that the draft permit will be certified.

VI. Comment Period, Hearing Requests, and Procedures for Final Decisions.

All persons, including applicants, who believe any condition of the draft permit is inappropriate must raise all issues and submit all available arguments and all supporting material for their arguments in full by the close of the public comment period, to the U.S. EPA, Compliance Branch, JFK Federal Building, Boston, Massachusetts 02203. Any person, prior to such date, may submit a request in writing for a public hearing to consider the draft permit to EPA and the State Agency. Such requests shall state the nature of the issues proposed to be raised in the hearing. A public hearing may be held after at least thirty days public notice whenever the Regional Administrator finds that response to this notice indicates significant public interest. In reaching a final decision on the draft permit the Regional Administrator will respond to all significant comments and make these responses available to the public at EPA's Boston office.

Following the close of the comment period, and after a public hearing, if such hearing is held, the Regional Administrator will issue a final permit decision and forward a copy of the final decision to the applicant and each person who has submitted written

comments or requested notice. Within 30 days following the notice of the final permit decision any interested person may submit a request for a formal hearing to reconsider or contest the final decision. Requests for formal hearings must satisfy the requirements of 40 C.F.R. §124.74, 48 Fed. Reg. 14279-14280 (April 1, 1983).

VII. EPA Contact.

Additional information concerning the draft permit may be obtained between the hours of 9:00 a.m. and 5:00 p.m., Monday through Friday, excluding holidays from:

David R. Cochrane WCI-2103
John F. Kennedy Federal Building
Boston, Massachusetts 02203
Telephone: (617)223-5061

April 17, 1986
Date

David A. Fierra, Director
Water Managment Division
Environmental Protection Agency

ATTACHMENT A

Characteristics of Outfall 001 - Non-contact cooling water

1983-84 DMR Data

	<u>Quarterly Mean</u>	
	<u>Daily Max.</u>	<u>Daily Average</u>
Flow	.45 mgd	.30 mgd
Temperature	75°F	65°F
TSS	5 mg/l	2 mg/l
Oil & Grease	3 mg/l	4 mg/l
pH Range	7.3 to 8.0	

Application Data

Average Daily non-stormwater flow = .34 mgd

Maximum Daily flow = .50 mgd

COD = 59 mg/l

TOC = 9 mg/l

Maximum Summer Temperature = 77°F

Oil & Grease = 3 mg/l

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 001: Non-contact cooling water and stormwater.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Avg. Monthly</u>	<u>Max. Daily</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Total Daily Flow	-	.50 mgd	1/Month	Estimate
Temperature	-	80°F	1/Month	Grab
TSS	-	10 mg/l	1/Month	Composite
Oil and Grease	-	5 mg/l	1/Month	Grab
COD	-	-	1/Quarter	Composite

Samples for all pollutants except COD shall be collected during non-stormwater runoff periods. The COD samples shall be collected during stormwater runoff events only.

The pH shall not be less than 6.5 standard units nor greater than 8.0 standard units except when due to intake pH and shall be monitored three times per month. Report range of four grabs for each monitoring occasion.


There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: manhole to building drain to 18 inch storm sewer on Orchard Street.

ase print or type in the unshaded areas only
ll-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM
1
GENERAL



U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER
F MA0029297

LABEL ITEMS

EPA I.D. NUMBER

II. FACILITY NAME

FACILITY MAILING ADDRESS

III. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

I. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS		MARK 'X'			SPECIFIC QUESTIONS		MARK 'X'		
		YES	NO	FORM ATTACHED			YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)			X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)			X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		X	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)			X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)			X		F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)			X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)			X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)			X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X	

II. NAME OF FACILITY

SKIP/ Tilcon Massachusetts, Incorporated

V. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
Anderson David Quarry Supervisor	617 994 7044

VI. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	B. CITY OR TOWN	C. STATE	D. ZIP CODE
430 Howard Street	Brockton	Ma	02403

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME
72 South Main Street	Bristol

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	1429	(specify)	Crushed and Broken Stone	7		(specify)	N/A
C. THIRD				D. FOURTH			
7		(specify)	N/A	7		(specify)	N/A

VIII. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the owner?			
Tilcon Massachusetts Incorporated												<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)					
F = FEDERAL		M = PUBLIC (other than federal or state)		P (specify)		N/A		617		588		3660			
S = STATE		O = OTHER (specify)													
P = PRIVATE															
E. STREET OR P.O. BOX															
430 Howard Street															
F. CITY OR TOWN								G. STATE		H. ZIP CODE		IX. INDIAN LAND			
Brockton								MA		02403		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)				D. PSD (Air Emissions from Proposed Sources)			
9	N			9	P		
B. UIC (Underground Injection of Fluids)				E. OTHER (specify)			
9	U			9		MA0002003	(specify) Refuse Act
C. RCRA (Hazardous Wastes)				E. OTHER (specify)			
9	R			9			(specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Tilcon Massachusetts, Inc. is an asphalt paving and roadway construction firm. The aggregate used in the operation is processed seasonally (8 months) at the quarry in Acushnet, Massachusetts, the location which is the subject of this report. All stone material is crushed to a maximum diameter of 4" and separates by a series of sieves according to size. The stone is then washed with water pumped from the quarry. The effluent is then pumped into two settling basins and reused along with additional quarry water as necessary. The stone, which is further crushed into sand, is then washed with water pumped from the quarry on the site. The effluent is then pumped into two settling basins and reused along with additional quarry water as necessary.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.		
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Leo Picard, Jr. President	Leo P. Picard Jr.	2-6-85

COMMENTS FOR OFFICIAL USE ONLY

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U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER
EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURAL OPERATIONS
Consolidated Permits Program

A. OUTFALL NUMBER (list)	B. LATITUDE			C. LONGITUDE			D. RECEIVING WATER (name)
	1. DEG.	2. MIN.	3. SEC.	1. DEG.	2. MIN.	3. SEC.	
001	70	54	18	41	40	23	Acushnet River
002	70	54	18	41	40	23	Acushnet River

[illegible]

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

☒ YES (complete the following table)☐ NO (go to Section III)

1. OUTFALL NUMBER (list)	2. OPERATION(s) CONTRIBUTING FLOW (list)	3. FREQUENCY		4. FLOW					c. DUR- ATION (in days)
		a. DAYS PER WEEK (specify average)	b. MONTHS PER YEAR (specify average)	a. FLOW RATE (in mgd)		b. TOTAL VOLUME (specify with units)			
				1. LONG TERM AVERAGE	2. MAXIMUM DAILY	1. LONG TERM AVERAGE	2. MAXIMUM DAILY		
001	Flow from water basin 001 (when sand, Plant is <u>NOT</u> in operation	7	5	.717 MGD	.717 MGD	1.11 F ³ /sec	1.11 F ³ /sec	7	

III. MAXIMUM PRODUCTION

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☐ YES (complete Item III-B)☒ NO (to Section IV)

B. Are the limitations in the applicable effluent guideline expressed in terms of production (or other measure of operation)?

☐ YES (complete Item III-C)☒ NO (go to Section IV)

C. If you answered "Yes" to Item III-B, list the quantity which represents an actual measurement of your maximum level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. MAXIMUM QUANTITY

a. QUANTITY PER DAY	b. UNITS OF MEASURE	c. OPERATION, PRODUCT, MATERIAL, ETC. (specify)	2. AFFECTED OUTFALLS (list outfall numbers)

IV. IMPROVEMENTS

A. Are you now required by any Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ YES (complete the following table)☒ NO (go to Item IV-B)

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS		3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE	
	a. NO.	b. SOURCE OF DISCHARGE		a. RE- QUIRED	b. PRO- JECTED

B. OPTIONAL: You may attach additional sheets describing any additional water pollution control programs (or other environmental projects which may affect your discharges) you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual or planned schedules for construction. ☐ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED

V. INTAKE AND EFFLUENT CHARACTERISTICS

A, B, & C: See instructions before proceeding — Complete one set of tables for each outfall — Annotate the outfall number in the space provided.
NOTE: Tables V-A, V-B, and V-C are included on separate sheets numbered V-1 through V-9.

D. Use the space below to list any of the pollutants listed in Table 2c-3 of the instructions, which you know or have reason to believe is discharged or may be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it to be present and report any analytical data in your possession.

1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE

VI. POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS

A. Is any pollutant listed in Item V-C a substance or a component of a substance which you do or expect that you will over the next 5 years use or manufacture as an intermediate or final product or byproduct?

☐ YES (list all such pollutants below)

☒ NO (go to Item VI-B)

B. Are your operations such that your raw materials, processes, or products can reasonably be expected to vary so that your discharges of pollutants may during the next 5 years exceed two times the maximum values reported in Item V?

☐ YES (complete Item VI-C below)

☒ NO (go to Section VII)

C. If you answered "Yes" to Item VI-B, explain below and describe in detail the sources and expected levels of such pollutants which you anticipate will be discharged from each outfall over the next 5 years, to the best of your ability at this time. Continue on additional sheets if you need more space.

VII. BIOLOGICAL TOXICITY TESTING DATA

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☐ YES (identify the test(s) and describe their purposes below)

☒ NO (go to Section VIII)

VIII. CONTRACT ANALYSIS INFORMATION

Were any of the analyses reported in Item V performed by a contract laboratory or consulting firm?

☐ YES (list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below)

☒ NO (go to Section IX)

A. NAME	B. ADDRESS	C. TELEPHONE (area code & no.)	D. POLLUTANTS ANALYZED (list)

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)

Leo Picard, Jr., President

B. PHONE NO. (area code & no.)

(617) 588-3660

C. SIGNATURE

Leo P. Picard Jr.

D. DATE SIGNED

1-29-85

Revere Copper Products, Inc.

A subsidiary of Revere Copper and Brass Incorporated

RECEIVED - EPA

DEC 17 1986

COMPLIANCE BRANCH



December 12, 1986

Permit Compliance Section
Compliance Branch
Water Management Division
Environmental Protection Agency
JFK Federal Building
Boston, Ma. 02203

Massachusetts Department of Environmental
Quality Engineering
Massachusetts Division of Water Pollution Control
Regulatory Branch
1 Winter Street
Boston, Ma. 02108

SUBJECT: REVERE COPPER PRODUCTS, INC.
NEW BEDFORD DIVISION
NPDES PERMIT NO. MA 0004821
DRAFT PERMIT AND FACT SHEET

Gentlemen:

We refer to your letter dated November 19, 1986 on the subject.

We have completed a preliminary review of the draft permit and fact sheet and have the following comments:

A. DRAFT PERMIT

1. Monitoring Requirements All-Outfalls

Under our present permit monitoring requirements of once per month, our Physical Laboratory Staff is already on an overtime schedule in order to provide the analytical data required to successfully operate our manufacturing operations and comply with the permit. Examination of the historical record of the quality of our effluent indicates substantive compliance with our permit limitations and any increase in the monitoring frequency would serve only to impose an additional financial burden on the Division. We firmly believe our present monitoring requirements are satisfactory for protection of the environment and should be retained in the reissued permit. *Currently monthly*

2. Effluent Limitations

A. Outfall 002

Our current permit specifies a PH range of 6.0 to 9.5 S.U. We batch treat and dump 9,000-10,000 gallons of treated effluent from our waste-water treatment

facility (WWFT) via Outfalls 002A, a tributary of Outfall 002, with a PH range of 9.0 - 9.2 S.U. This elevated PH is necessary in order to precipitate the required amount of nickel from our Effluent to achieve permit compliance. At a time when there are no flows thru Outfall 002 other than that from the (WWFT) the PH range proposed for 002 would not be able to be met. The present PH range should be maintained so that additional treatment simply to adjust PH is avoided.

B. Outfall 004B *PH is State requirement*

Our present permit specifies a PH range of 6.0 to 8.5 S.U. For effective oil/water separation, we must introduce alum into the separator from time to time, most especially, when we are in the process of removing the oily sludge in preparation for a filter change. While providing the necessary treatment to maintain compliance with the oil and grease limits, the addition of alum reduces the PH of this effluent. We believe the alum treatment is necessary and a retension of our present permitted PH limits would enable us to continue this practice. *PH is State requirement - but for RW. Can we assume a mixing zone?*

C. Outfall 004C

Our present permit specifies a PH range of 6.0 to 8.5 S.U. In light of the information presented in B, Outfall 004B above we believe the present PH limitations should be retained since 004 B is tributary to Outfall 004 C.

In addition, we note compliance with all specified pollutant limitations and conditions for this Outfall is required "beginning on the effective date and lasting through the expiration date", on the proposed permit. We believe these limitations and conditions should not become effective until such time as the extension of the City of New Bedford sanitary sewer is completed plus an appropriate amount of time allocated by means of the inclusion of a compliance schedule for New Bedford Division to redirect its present flows to the new sanitary sewer system. *Agency no can do*

D. Outfall 002, 002A, 004B

Present analysis of our pond water supply indicates the presence of lead. Analyses for the other metallic pollutant parameters limited by our permit have not been conducted to date. Having detected lead in this water supply we have reason to believe some of the other metals may also be present. For this reason we believe all limitations for metals in our effluents should be specified as "net" values. *All cannot be done up - but there are BAT limits.*

B. FACT SHEET

We note in attachment E the supporting data and developing the proposed effluent limitations, that the off-pound allowances for chromium, copper, lead, nickel, zinc, oil and grease and total suspended solids specified in 40 CFR 468 Subpart A, Copper Forming Subcategory for Miscellaneous Wastes Streams were overlooked in the development of our proposed permit limitations. A review of the regulatory definition for these waste streams indicates these pollutant allowances should have been included.

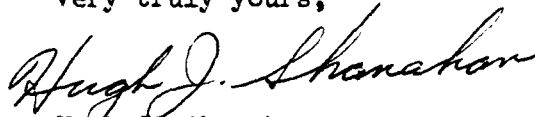
No production values were given for Misc. waste streams.

Ask Steve

We respectfully request that the Agencies modify the subject permit in accordance with the above comments.

We will continue to review the draft permit. If there are any changes to our comments before the expiration of the formal comment period, we will advise you accordingly.

Very truly yours,


Hugh J. Shanahan

HJS C

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203

FACT SHEET

DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
PERMIT TO DISCHARGE TO WATERS OF THE UNITED STATES

NPDES PERMIT NO.: MA0004821

STATE PERMIT NO.:

NAME AND ADDRESS OF APPLICANT:

Revere Copper Products, Inc.
24 North Front Street
New Bedford, MA 02741

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

Revere Copper Products, Inc.
24 North Front Street
New Bedford, MA 02741

RECEIVING WATER: Acushnet River

CLASSIFICATION: SB

I. Proposed Action, Type of Facility, and Discharge Location.

The above named applicant has applied to the U.S. Environmental Protection Agency for reissuance of their NPDES permit to discharge into the designated receiving water. The facility is engaged in the fabrication of copper and copper alloy plates. The discharge from the facility consists of process wastewaters from cleaning and rolling operations, contact and non-contact cooling waters, laboratory wastewaters, stormwater and sanitary wastewaters. There are two discharges, 002 and 004C, from the facility to the Acushnet River at New Bedford, Massachusetts. The proposed permit includes two additional sampling points, 002A and 004B. Discharge 002A is the discharge from the waste treatment facility, and discharge 004B is the discharge from the Gale oil separator.

Treatment at the facility consists of neutralization, flocculation and sedimentation, and pressure filtration of process wastewaters from the acid bath and rinse lines, as well as oil separation of spent rolling lubricants.

II. Description of Discharge

A quantitative description of the discharge in terms of significant effluent parameters based on application information is shown in Attachment A. A diagram of water flow at the facility is given in Attachment B.

III. Limitations and Conditions.

The effluent limitations of the draft permit, the monitoring requirements, and any implementation schedule (if required) may be found on the following attachments:

Attachment C: Effluent limitations and monitoring requirements (Part I of draft permit).

Revere Copper Products, Inc. (RCP) is currently discharging non-contact cooling water, sanitary wastewater, and stormwater to a sewer owned by the City of New Bedford. That sewer currently runs adjacent to and through RCP property, and discharges directly to the Acushnet River at RCP sampling point 004C. At present, there are plans to extend the sanitary portion of the sewer approximately 400 feet and connect to a 21" sewer line at Wamsutta Street (see plan diagram, Attachment D). After completion of this extension, the sewer line running through RCP property will convey stormwater only. The draft permit stipulates that after the completion of the sewer extension, there shall be no discharge of sanitary wastewaters to the New Bedford storm sewer.

IV. Permit Basis and Explanation of Effluent Limitation Derivation.

The Clean Water Act (CWA) established the national objective "to restore and maintain the chemical and biological integrity of the Nation's waters". The Act requires the Administrator to establish, for existing facilities, effluent limitations which satisfy both minimal technology and water quality requirements. The technologies which are presently applicable are: best practicable control technology currently available (BPT), Section 301(b)(1)(A) of the CWA; best available technology economically achievable (BAT), Section 301(b)(2)(A) of the CWA; and best conventional pollution control technology for conventional pollutants (BCT), Section 301(b)(2)(E) of the CWA.

Final regulations establishing BPT and BAT limitations for the copper forming point source category were promulgated by EPA on August 15, 1983 at 48 FR 36957 (or see 40 CFR § 468).

In addition to meeting technology-based limitations, the discharge must also meet instream water quality criteria, maintaining the Acushnet River as a Class SB waterway in accordance with state water quality requirements, pursuant to Section 401(a)(1) of the

CWA. Since the Acushnet River at New Bedford, Massachusetts provides substantial dilution at low flow (7Q10), the technology-based categorical limitations are more stringent, and are used in the development of permit limitations.

The permit must also satisfy all state effluent limitations and certification requirements as per 40 CFR §§ 122.53 and 122.55, as well as satisfy 40 CFR § 122.44(1)(1) which stipulates that effluent limitations in the draft permit must be at least as stringent as those presented in the previous permit.

Calculations of technology based permit limitations were performed according to the guidelines presented at 40 CFR § 468. These BAT guidelines are production based, resulting in mass based limitations dependant upon production at a given facility. Calculation of these limitations are shown in Attachment E.

It should be noted that in the previous permit, limitations for metals were measured as dissolved metals, whereas current methods require measurement of total metals. Therefore, the limitations have been adjusted by adding 1.0 mg/l to the dissolved metal limitations to account for metals present in the suspended form. The previous permit stipulated that "the maximum permissible level for a particular metal in the total suspended solids shall be 1 mg/l." This adjustment is not made in the case of hexavalent chromium, which is present only in the dissolved form.

Comparisons between BAT limitations and those of the previous permit were made by calculating the total daily mass resulting from discharge at the levels prescribed by the previous permit (after adjustment for total metals), and comparing them with the mass allowed for that particular pollutant by the BAT guidelines (see Attachment E).

Comparisons showed that the BAT limitations for metals (total chromium, total copper, total lead, total nickel, and total zinc) are more stringent than the limitations of the previous permit after adjustment. The effluent limitation for hexavalent chromium is based on the previous permit, because there is no BAT limitation for the hexavalent form. Temperature requirements are also based on the previous permit.

Review of Discharge Monitoring Report data shows increased metals concentrations at discharge 002 when compared to concentrations at 002A. This implies that metal bearing wastewaters are entering the wastestream downstream from the discharge of the waste treatment facility. However, since no production values are known for the sources of these metal bearing wastestreams, concentration-based limitations were developed for discharge 002, using the mass-based BAT limitations from discharge 002A (see Attachment F). The flow value used in these calculations is the average of actual reported flows for discharge 002A.

The resulting concentration-based limitations at 002 represent the level of treatment required by BAT at the discharge of the treatment facility (002A). These limitations were compared with the limitations attained using the average of reported flows at 002. (The resulting concentration would represent the diluted flow from 002A with no allowance for additional metals.) Comparisons were also made with the Massachusetts metal finishing requirements, and with the previous permit limitations adjusted to total metals. Metals limitations used at 002 are the more stringent of either: 1) the concentration-based BAT levels from discharge 002A; 2) the Massachusetts metal finishing requirements; or 3) the adjusted concentrations from the previous permit.

Effluent limitations for discharge 004B for total copper, total lead, total nickel, and total zinc are based on the BAT guidelines presented at 40 CFR § 468.

Effluent limitations presented in the draft permit for oil and grease, TSS, pH and temperature are based on Massachusetts state water quality requirements.

The effluent monitoring requirements have been established to yield data representative of the discharges under the authority of Section 308(a) of the Clean Water Act, according to regulations set forth at 40 CFR 122.41(j), 122.44(i), and 122.48.

The monitoring program in the permit specifies routine sampling and analysis which will provide continuous general information on the reliability and effectiveness of any installed pollution abatement equipment.

V. State Certification Requirements.

EPA may not issue a permit unless the State Water Pollution Control Agency with jurisdiction over the receiving waters certifies that the effluent limitations contained in the permit are stringent enough to assure that the discharge will not cause the receiving water to violate state water quality standards. The staff of the Massachusetts Division of Water Pollution Control (MDWPC) has reviewed the draft permit and advised EPA that the limitations are adequate to protect water quality. EPA has requested permit certification by the State and expects that the draft permit will be certified.

VI. Comment Period, Hearing Requests, and Procedures for Final Decisions.

All persons, including applicants, who believe any condition of the draft permit is inappropriate must raise all issues and submit all available arguments and all supporting material for their arguments in full by the close of the public comment period, to

the U.S. EPA, Compliance Branch, JFK Federal Building, Boston, Massachusetts 02203. Any person, prior to such date, may submit a request in writing for a public hearing to consider the draft permit to EPA and the State Agency. Such requests shall state the nature of the issues proposed to be raised in the hearing. A public hearing may be held after at least thirty days public notice

whenever the Regional Administrator finds that response to this notice indicates significant public interest. In reaching a final decision on the draft permit the Regional Administrator will respond to all significant comments and make these responses available to the public at EPA's Boston office.

Following the close of the comment period, and after a public hearing, if such hearing is held, the Regional Administrator will issue a final permit decision and forward a copy of the final decision to the applicant and each person who has submitted written comments or requested notice. Within 30 days following the notice of the final permit decision any interested person may submit a request for a formal hearing to reconsider or contest the final decision. Requests for formal hearings must satisfy the requirements of 40 C.F.R. §124.74, 48 Fed. Reg. 14279-14280 (April 1, 1983).

VII. EPA Contact.

Additional information concerning the draft permit may be obtained between the hours of 9:00 a.m. and 5:00 p.m., Monday through Friday, excluding holidays from:

Michael Marsh
John F. Kennedy Federal Building, WCI 2103
Boston, Massachusetts 02203
Telephone: (617)565-3510

October 29, 1986
Date

David A. Fierra, Director
Water Management Division
Environmental Protection Agency

ATTACHMENT A

DESCRIPTION OF DISCHARGE BASED ON APPLICATION DATA AND SUPPLEMENTAL
INFORMATION FROM PERMITTEE.

DISCHARGE 002-1 (Discharge 002 in new draft permit)

<u>Parameter</u>	<u>Average</u>	<u>Maximum</u>
Total Flow (MGD)	-	0.0334
TSS (mg/l)	-	12
Oil and Grease (mg/l)	-	9.0
Total Chromium (mg/l)	-	0.004
Total Copper (mg/l)	-	10.8
Total Lead (mg/l)	-	0.022
Total Nickel (mg/l)	-	2.19
Total Zinc (mg/l)	-	1.34
pH (S.U.)	6.0	-
Temperature	-	12.2°C (winter)
	-	26 °C (summer)

ATTACHMENT A

DESCRIPTION OF DISCHARGE BASED ON APPLICATION DATA AND SUPPLEMENTAL
INFORMATION FROM PERMITTEE.

DISCHARGE 004B

<u>Parameter</u>	<u>Average</u>	<u>Maximum</u>
Total Flow (MGD)	-	0.0106
TSS (mg/l)	-	11
Oil and Grease (mg/l)	-	<5.0
Total Chromium (mg/l)	-	0.006
Total Copper (mg/l)	-	1.32
Total Lead (mg/l)	-	<0.016
Total Nickel (mg/l)	-	0.045
Total Zinc (mg/l)	-	0.860
pH (S.U.)	6.7	-
Temperature	-	8.9°C (winter)
	-	24 °C (summer)

FACILITY WATER FLOW

GALLONS PER DAY

REVERE COPPER PRODUCTS IN
NEW BEDFORD DIVISION
NEW BEDFORD MASS.

FEB. 1984

STORM WATER	33,000
SANITARY WATER	10,500
COMPRESSORS	22,800
MAIN BOILERS	1225
2 WASHER BOILERS	1225
LAB	2400
SHEET WASHER	630
RECIRCULATING SYSTEM	3130
SHEET WASHER	13600
PLATE WASHER	1920
PLATE ROLLS	9600
HOT BREAKDOWN ROLLS	13,600
HOT ROLLS	1000
500KW FURNACE	8870
COLD ROLL DRG.	600
HOT BREAKDOWN FURN.	4600
HOT ROLL DRIVE	2200
AIR CONDITIONERS	900
SALT BATH FURN.	19,000

EVAPORATION
2250

002A
WASTE WATER
TREATMENT SYSTEM
21,000

CASH SHOP
RECIRCULATING
SYSTEM
12,000

004B
OIL SEPERATION
SYSTEM
31,000

STORM WATER &
SANITARY WATER
BY OTHERS.
FLOW UNKNOWN

004C OUTFALL
82,400
(NEVER FUR)

002-1 OUTFALL
89,000

CITY OF NEW BEDFORD SEWER LINE

High Tide

SAMPLE
STATION

ATTACHMENT C

Page 2 of 9
Permit No. MA0004821

1. All existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Director as soon as they know or have reason to believe:

- a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) One hundred micrograms per liter (100 ug/l);
 - (2) Two hundred micrograms per liter (200 ug/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 ug/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;
 - (3) Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 C.F.R. §122.21(g)(7); or
 - (4) Any other notification level established by the Director in accordance with 40 C.F.R. §122.44(f).
- b. That any activity has occurred or will occur which would result in the discharge, on a non-routine or infrequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) Five hundred micrograms per liter (500 ug/l);
 - (2) One milligram per liter (1 mg/l) for antimony;
 - (3) Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 C.F.R. §122.21(g)(7); or
 - (4) Any other notification level established by the Director in accordance with 40 C.F.R. §122.44(f).
- c. That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the permit application.

PART I

Page 3 of 9
Permit No. MA0004821

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

2. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 002A - discharge from waste treatment system, consisting of treated acid pickle bath and rinse wastewaters, fume scrubber wastewaters, laboratory wastewaters and non-contact cooling water.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow, MGD	Report	Report	Continuous	Total Daily
Total Chromium	51 grams/day	125 grams/day	2/month	Composite
Hexavalent Chromium	0.05 mg/l	0.1 mg/l	2/month	Grab
Total Copper	285 grams/day	542 grams/day	2/month	Composite
Total Lead	37 grams/day	42 grams/day	2/month	Composite
Total Nickel	362 grams/day	548 grams/day	2/month	Composite
Total Zinc	174 grams/day	416 grams/day	2/month	Composite
TSS	20 mg/l	30 mg/l	2/month	Composite

The pH shall not be less than 6.0 standard units nor greater than 9.5 standard units and shall be monitored continuously. Report range.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: sample point 002A, discharge point of waste treatment facility.

ATTACHMENT C

PART I

A. . EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

3. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 002 - treatment facility discharge, contact and non-contact cooling waters, stormwater.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow, MGD	Report	Report	Continuous	Total Daily
Total Copper	1.5 mg/l	2.0 mg/l	2/month	Composite
Total Lead	0.4 mg/l	0.5 mg/l	2/month	Composite
Total Nickel	1.8 mg/l	3.6 mg/l	2/month	Composite
Total Zinc	1.5 mg/l	2.0 mg/l	2/month	Composite
TSS	20 mg/l	30 mg/l	2/month	Composite
Oil and Grease	-	15 mg/l	1/Week	Grab
Temperature	-	90°F (32.2°C)	2/month	Grab
TT0 ¹	-	Report	1/month	Grab

The pH shall not be less than 6.5 standard units nor greater than 8.5 standard units and shall be monitored daily by grab sample. Report range.

There shall be no discharge of floating solids, visible foam or oil sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: 002, discharge point to the Acushnet River.

¹ For TIO definition and monitoring requirements, see page 7 of 9.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

4. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 004B - discharge from the Gale Oil Separator.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow, MGD	Report	Report	Continuous	Total Daily
Total Copper	192 grams/day	364 grams/day	2/month	Composite
Total Lead	24 grams/day	28 grams/day	2/month	Composite
Total Nickel	242 grams/day	368 grams/day	2/month	Composite
Total Zinc	116 grams/day	280 grams/day	2/month	Composite
Oil and Grease	-	15 mg/l	1/week	Grab
TSS	20 mg/l	30 mg/l	2/month	Composite
TTO ¹	-	Report	1/month	Grab

The pH shall not be less than 6.5 standard units nor greater than 8.5 standard units and shall be monitored monthly by grab sample. Report range.

There shall be no discharge of floating solids, visible foam or oil sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: 004B, discharge from the Gale Oil Separator.

¹ for TTO definition and monitoring requirements, see page 7 of 9.

PART I

Page 6 of 9
Permit No. MA0004821

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

5. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 004C - discharge from Gale Oil Separator, sanitary wastewater*, non-contact cooling water, and stormwater.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow, MGD	-	Report	1/month	Estimate Total Daily
Temperature	-	90°F (32.2°C)	1/month	Grab

The pH shall not be less than 6.5 standard units nor greater than 8.5 standard units and shall be monitored monthly by grab sample. Report range.

There shall be no discharge of floating solids or visible foam or oil sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: 004C, discharge point to the Acushnet River.

* After completion of the extension of the City of New Bedford sanitary sewer to the sewer line at Wamsutta Street, there shall be no discharge of sanitary wastewater to discharge 004C.

ATTACHMENT C

Total Toxic Organics

The term "Total Toxic Organics" (TTO) is the summation of all quantifiable values greater than 0.01 milligrams per liter (mg/l) for the following toxic organics:

Acenaphthene
Acrolein
Acrylonitrile
Benzene
Benzidine
Carbon tetrachloride
(tetrachloromethane)
Chlorobenzene
1,2,4-trichlorobenzene
Hexachlorobenzene
1,2-dichloroethane
1,1,1-trichloroethane
Hexachloroethane
1,1-dichloroethane
1,1,2-trichloroethane
1,1,2,2-tetrachloroethane
Chloroethane
Bis (2-chloroethyl) ether
2-chloroethyl vinyl ether
(mixed)
2-chloronaphthalene
2,4,6-trichlorophenol
Parachlorometa cresol
Chloroform (trichloromethane)
2-chlorophenol
1,2-dichlorobenzene
N-nitrosodi-o-propylamine
Pentachlorophenol
Phenol
Bis (2-ethylhexyl) phthalate
Butyl benzyl phthalate
Di-o-butyl phthalate
Di-o-octyl phthalate
Diethyl phthalate
Dimethyl phthalate
1,2-benzanthracene
(benzo(a)anthracene)
Benzo(a)pyrene (1,4-benzopyrene)
3,4-Benzofluoranthene
(benzo(b)fluoranthene)
1,1,2-benzofluoranthene
(benzo(k)fluoranthene)
Chrysene

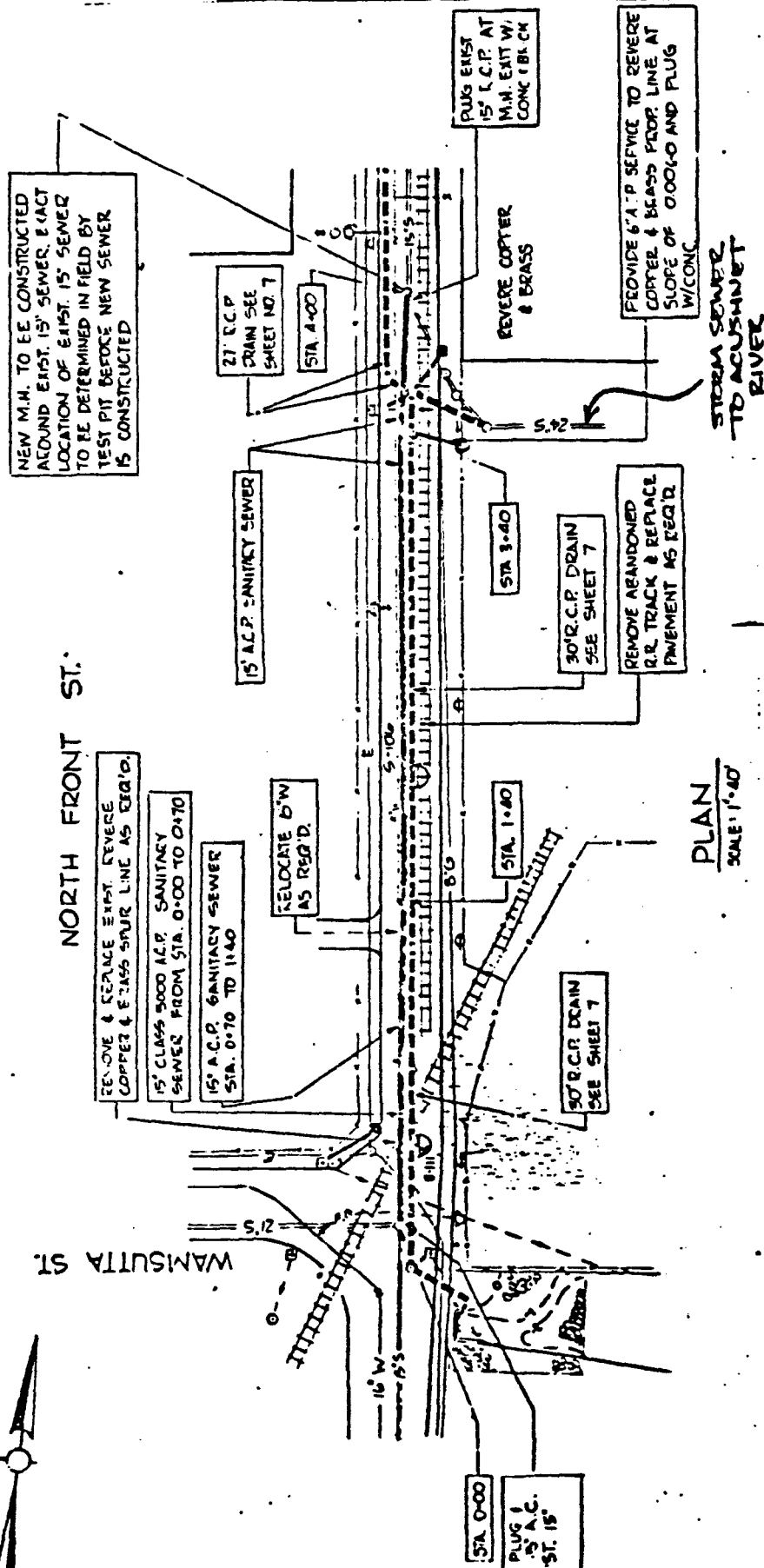
Acenaphthylene
Anthracene
1,2-benzoperylene
(benzo(ghi)perylene)
Fluorene
Phenanthrene
1,2,5,6-dibenzanthracene
(dibenzo(a,b)anthracene)
Indeno(1,2,3-cd) pyrene
(2,3-o-phenylene pyrene)
Pyrene
Tetrachloroethylene
Toluene
1,3-dichlorobenzene
1,4-dichlorobenzene
3,3-dichlorobenzidine
1,1-dichloroethylene
1,2-trans-dichloroethylene
2,4-dichlorophenol
1,2-dichloropropane
(1,3-dichloropropene)
2,4-dimethylphenol
2,4-dinitrotoluene
2,6-dinitrotoluene
1,2-diphenylhydrazine
Ethylbenzene
Fluoranthene
4-chlorophenyl phenyl ether
4-bromophenyl phenyl ether
Bis (2-chloroisopropyl) ether
Bis (2-chloroethoxy) methane
Methylene chloride
(dichloromethane)
Methyl chloride
(chloromethane)
Methyl bromide (bromomethane)
Bromoform (tribromomethane)
Dichlorobromomethane
Chlorodibromomethane
Hexachlorobutadiene
Hexachlorocyclopentadiene
Isophorone

Naphthalene
Nitrobenzene
3-nitrophenol
4-nitrophenol
2,4-dinitrophenol
4,6-dinitro-o-cresol
N-nitrosodimethylamine
N-nitrosodiphenylamine
Trichloroethylene
Vinyl chloride (chloroethylene)
Aldrin
Dieldrin
Chlordane (technical mixture and metabolites)
4,4-DDT
4,4-DDE (p,p-DDX)
4,4-DDD (p,p-TDE)
Alpha-endosulfan
Beta-endosulfan
Endosulfan sulfate
Endrin
Endrin aldehyde
Heptachlor
Heptachlor epoxide
(EHC-hexa chlorocyclohexene)
Alpha-EHC
Beta-EHC
Gamma-EHC
Delta-EHC
(PCB-polychlorinated biphenyls)
PCB-1242 (Arochlor 1242)
PCB-1254 (Arochlor 1254)
PCB-1221 (Arochlor 1221)
PCB-1232 (Arochlor 1232)
PCB-1248 (Arochlor 1248)
PCB-1280 (Arochlor 1280)
PCB-1016 (Arochlor 1016)
Toxaphene
2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD)

In monitoring for Total Toxic Organics, the permittee need analyze for only those pollutants which would reasonably be expected to be present. The permittee may make the following certification on its monitoring reports in lieu of conducting an analysis: "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitations for total toxic organics (TTO). I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the solvent management plan submitted to the permitting authority."

In requesting the certification alternative, the permittee shall submit a solvent management plan that specifies, to the satisfaction of the permitting authority: the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and the procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater. This plan shall become a part of and an enforceable provision of this permit.

ATTACHMENT D



SEVERE COPPER

1A004921

ATTACHMENT E

004 B

HTI 300000 = SPENT WUPPENT - BAT Prod. = 2.922×10^6 10/day

(16 / 10⁶ eff. 16)

(16 / day)

Daily Max. Monthly Avg.

Daily Max. Monthly Avg.

0.245 0.016

1.131 0.053

0.195 0.103

0.569 0.300

0.015 0.013

0.044 0.038

0.197 0.130

0.575 0.379

0.150 0.032

0.438 0.121

2.060 1.236

6.019 3.611

4.223 2.008

12.340 5.867

004 B

HTI 300000 = SPENT WUPPENT - BAT

Prod. = 0.261×10^6 11/day

(16 / 10⁶ eff. 16)

(16 / day)

Daily Max. Monthly Avg.

Daily Max. Monthly Avg.

0.166 0.068

0.043 0.018

0.720 0.379

0.187 0.099

0.056 0.049

0.015 0.013

0.727 0.481

0.189 0.125

0.553 0.231

0.194 0.060

7.580 4.548

1.978 1.187

15.539 7.390

9.056 1.929

004 B

3 PICKLING RINSE WATER BAT -|----- (16/10⁶ off. 16) -----|Prod. = 0.020 x 10⁶ LB/day

|----- (16/day) -----|

Daily Max. Monthly Avg.Daily Max. Monthly Avg.

T 0.545 0.273

0.011 0.004

T 2.356 1.240

0.047 0.025

T 0.186 0.161

0.004 0.003

T 2.380 1.574

0.048 0.032

T 1.810 0.756

0.036 0.015

* 113.340 68.004

2.267 1.360

* 232.347 110.506

4.647 2.210

002

PICKLING RINSE BAT - Prod. = 0.384 x 10⁶ LB/day|----- (16/10⁶ off. 16) -----|

|----- (16/day) -----|

Daily Max. Monthly Avg.Daily Max. Monthly Avg.

T 0.574 0.235

0.220 0.090

T 2.481 1.306

0.952 0.501

T 0.195 0.169

0.075 0.065

T 2.507 1.658

0.962 0.636

T 1.906 0.796

0.731 0.305

T 72.440 43.469

27.817 16.690

* 148.502 70.629

57.025 27.122

⑤ PICKLING BATH BAT - Prod. = 0.182×10^6 LB/DAY

002

(16/10⁶ off - 16)

(16/day)

Daily Max. Monthly Avg.

Daily Max. Monthly Avg.

T	0.051	0.020
T	0.220	0.116
T	0.017	0.015
T	0.222	0.147
T	0.164	0.070
*	2.320	1.392
*	4.756	2.262

0.009	0.004
0.040	0.021
0.003	0.003
0.040	0.027
0.031	0.013
0.422	0.253
0.866	0.412

PICKLING FUME SCRUBBER BAT -

Prod. = 0.173×10^6 LB/DAY

002

(16/10⁶ off - 16)

(16/day)

Daily Max. Monthly Avg.

Daily Max. Monthly Avg.

-	0.275	0.112
-	1.189	0.426
T	0.093	0.081
T	1.201	0.795
T	0.913	0.381
*	12.520	7.512
*	25.446	12.207

0.048	0.019
0.205	0.108
0.016	0.014
0.207	0.137
0.157	0.066
2.166	1.300
4.440	2.111

① + ② + ③

004 B

(161 day)

	<u>Daily Max.</u>	<u>Monthly Avg.</u>
Cr _T	0.185	0.075
Al _T	0.803	0.424
Pb _T	0.063	0.054
Ni _T	0.812	0.535
Zn _T	0.618	0.256
Cu*	10.264	6.158
S*	21.043	10.006

Comparison with metals limitations (adjusted to total metals) from previous permit:

	<u>Daily Max.</u>	<u>Monthly Avg.</u>
Cu _T , Pb _T , Zn _T	2.0 mg/L	1.5 mg/L

70,000 GPD 45,000 GPD

$$(2.0 \frac{\text{mg}}{\text{L}})(10^{-6} \frac{\text{kg}}{\text{mg}})(2.20 \frac{\text{lb}}{\text{kg}})(70,000 \frac{\text{gal}}{\text{day}})(3.785 \frac{\text{L}}{\text{gal}}) = \underline{\underline{1.16 \text{ lb/day, daily max.}}}$$

$$(1.5 \frac{\text{mg}}{\text{L}})(10^{-6} \frac{\text{kg}}{\text{mg}})(2.20 \frac{\text{lb}}{\text{kg}})(45,000 \frac{\text{gal}}{\text{day}})(3.785 \frac{\text{L}}{\text{gal}}) = 0.56 \text{ lb/day, monthly max.}$$

④ + ⑤ + ⑥

002A

(lb/day)

	Daily Max.	Monthly Avg.
Cr _T	1.277	0.113
Cu _T	1.197	0.630
Pb _T	0.074	0.082
Ni _T	1.209	0.800
Zn _T	0.919	0.384
16*	30.405	18.243
SS*	62.331	29.644

Cr _T	1.277	0.113
Cu _T	1.197	0.630
Pb _T	0.074	0.082
Ni _T	1.209	0.800
Zn _T	0.919	0.384
16*	30.405	18.243
SS*	62.331	29.644

Comparison with metals limitations (adjusted to total metals) from previous permit:

	Daily Max.	Monthly Avg.
Cr _T , Cu _T , Pb _T	2.0 mg/l	1.5 mg/l
Ni _T , Zn _T	120,000 gpd	90,000 gpd.
16W		

$$(2.0 \text{ mg/l})(10^{-6} \frac{\text{kg}}{\text{mg}})(2.20 \frac{\text{lb}}{\text{kg}})(120,000 \frac{\text{gal}}{\text{day}})(3.785 \frac{\text{l}}{\text{gal}})$$

$$= \underline{\underline{2.0 \text{ lb/day, daily max.}}}$$

$$(1.5 \text{ mg/l})(10^{-6} \frac{\text{kg}}{\text{mg}})(2.20 \frac{\text{lb}}{\text{kg}})(90,000 \frac{\text{gal}}{\text{day}})(3.785 \frac{\text{l}}{\text{gal}})$$

$$= \underline{\underline{1.12 \text{ lb/day, monthly avg.}}}$$

004B

(grams/day)

	<u>Daily Max.</u>	<u>Monthly Avg.</u>
Cr _T	83.9	34.0
Cu _T	364.2	192.3
Pb _T	28.5	24.4
Ni _T	368.3	242.6
Zn _T	280.3	116.1

002

(grams/day)

	<u>Daily Max.</u>	<u>Monthly Avg.</u>
Cr _T	125.6	51.2
Cu _T	542.9	285.7
Pb _T	42.6	37.1
Ni _T	548.3	362.8
Zn _T	416.8	174.1

LEVERE COPPER PRODUCTS

ATTACHMENT F

DISCHARGE 002

DMR DATE REPORTED FLOW

9/85 67,100 gpd

8/85 64,500

7/85 90,400

6/85 74,400

5/85 57,000

4/85 32,800

≠

9/84 58,500

8/84 41,200

7/84 35,200

6/84 23,600

5/84 30,400

4/84 60,900

3/84 56,800

2/84 37,800

1/84 32,200

Avg = 50,800 gpd

DISCHARGE 002-A

DMR DATE REPORTED FLOW

some 15,370 gpd

26,670

12,360

25,600

20,400

22,200

≠

24,500

20,600

18,600

24,300

24,300

24,700

21,230

22,360

21,000

Q_{avg} = 21,600 gpd

ATTACHMENT F

2

DISCHARGE 002

CALCULATION OF CONCENTRATIONS ALLOWED BY BAT LIMITATIONS (MASS-BASED)
USING AVERAGE FLOW FROM FACILITY @ 002.

$$Q_{\text{avg}_{002}} = (50,800 \frac{\text{GAL}}{\text{day}}) (3.785 \frac{\text{L}}{\text{GAL}}) = 192,000 \frac{\text{L}}{\text{day}}.$$

$$Q_{\text{avg}_{002A}} = (21,600 \frac{\text{GAL}}{\text{day}}) (3.785 \frac{\text{L}}{\text{GAL}}) = 81,800 \frac{\text{L}}{\text{day}}.$$

LIMITATIONS:

$$\text{max. Cr}_T : (125.6 \text{ grams/day}) / (192,000 \frac{\text{L}}{\text{day}}) = 0.654 \frac{\text{mg}}{\text{L}}$$

$$\text{Cr}_T : (51.2 \text{ g/day}) / (192,000 \text{ L/day}) = 0.266 \text{ mg/L}$$

$$\text{max. Cu}_T : (542.9 \text{ g/day}) / (192,000 \text{ L/day}) = 2.827 \text{ mg/L}$$

$$\text{Cu}_T : (285.7 \text{ g/day}) / (192,000 \text{ L/day}) = 1.488 \text{ mg/L}$$

$$\text{max. Pb}_T : (42.6 \text{ g/day}) / (192,000 \text{ L/day}) = 0.221 \text{ mg/L}$$

$$\text{Pb}_T : (37.1 \text{ g/day}) / (192,000 \text{ L/day}) = 0.193 \text{ mg/L}$$

$$\text{max. Ni}_T : (548.3 \text{ g/day}) / (192,000 \text{ L/day}) = 2.855 \text{ mg/L}$$

$$\text{Ni}_T : (362.8 \text{ g/day}) / (192,000 \text{ L/day}) = 1.889 \text{ mg/L}$$

$$\text{max. Zn}_T : (416.8 \text{ g/day}) / (192,000 \text{ L/day}) = 2.170 \text{ mg/L}$$

$$\text{Zn}_T : (174.1 \text{ g/day}) / (192,000 \text{ L/day}) = 0.906 \text{ mg/L}$$

REVERE COPPER PRODUCTS

CONCENTRATION BASED LIMITATIONS FOR DISCHARGE CO₂ (mg/l):

	I	II	CO ₂ flow III	CO ₂ flow IV
MAX Cr _T	2.77	—	0.654	1.535
AVG. Cr _T	1.5	—	0.266	0.674
MAX Cu _T	3.0	2.0	2.827	6.635
AVG. Cu _T	1.5	1.5	1.488	3.492
MAX. Pb _T	0.69	—	0.221	0.518
AVG. Pb _T	0.43	—	0.193	0.453
MAX. Ni _T	3.6	—	2.855	6.701
AVG. Ni _T	1.8	—	1.889	4.433
MAX Zn _T	2.61	2.0	2.170	5.093
AVG. Zn _T	1.48	1.5	0.906	2.126

I: MA. BAT LIMITATIONS FOR METAL FINISHERS

II: PREVIOUS PERMIT

III: CALCULATED FROM MASS-BASED BAT FOR COPPER FORMING
INDUSTRY, USING AVG. FLOW FROM FACILITY DISCHARGE CO₂IV: CALCULATED FROM MASS-BASED BAT FOR COPPER FORMING
INDUSTRY, USING AVG. FLOW FROM FACILITY DISCHARGE CO₂

State Permit No.
Federal Permit No. MA0004821
Page 1 of 9

AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Clean Water Act, as amended, (33 U.S.C. §§1251 et seq.; the "CWA"), and the Massachusetts Clean Waters Act, as amended, (M.G.L. Chap. 21, §§26-53),

~~Revere~~ Copper Products, Inc.

is authorized to discharge from the facility located at

24 North Front Street
New Bedford, Massachusetts

to receiving waters named

Acushnet River

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

This permit shall become effective on

This permit and the authorization to discharge expire at midnight, five years from date of issuance.

This permit supersedes the permit issued on December 23, 1974.

This permit consists of 9 pages in Part I including effluent limitations, monitoring requirements, etc., and 19 pages in Part II including General Conditions and Definitions.

Signed this day of

DRAFT

Director
Water Management Division
Environmental Protection Agency
Region I
Boston, MA

Director, Division of Water
Pollution Control
Department of Environmental
Quality Engineering
Commonwealth of Massachusetts
Boston, MA

DRAFT

Page 2 of 9
Permit No. MA0004821

1. All existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Director as soon as they know or have reason to believe:

- a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) One hundred micrograms per liter (100 ug/l);
 - (2) Two hundred micrograms per liter (200 ug/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 ug/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;
 - (3) Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 C.F.R. §122.21(g)(7); or
 - (4) Any other notification level established by the Director in accordance with 40 C.F.R. §122.44(f).
- b. That any activity has occurred or will occur which would result in the discharge, on a non-routine or infrequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) Five hundred micrograms per liter (500 ug/l);
 - (2) One milligram per liter (1 mg/l) for antimony;
 - (3) Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 C.F.R. §122.21(g)(7); or
 - (4) Any other notification level established by the Director in accordance with 40 C.F.R. §122.44(f).
- c. That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the permit application.

DRAFT

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

2. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 002A - discharge from waste treatment system, consisting of treated acid pickle bath and rinse wastewaters, fume scrubber wastewaters, laboratory wastewaters and non-contact cooling water.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow, MGD	Report	Report	Continuous	Total Daily
Total Chromium	51 grams/day	125 grams/day	Monthly	Composite
Hexavalent Chromium	0.05 mg/l	0.1 mg/l	Monthly	Composite
Total Copper	285 grams/day	542 grams/day	Monthly	Composite
Total Lead	37 grams/day	42 grams/day	Monthly	Composite
Total Nickel	362 grams/day	548 grams/day	Monthly	Composite
Total Zinc	174 grams/day	416 grams/day	Monthly	Composite
TSS	20 mg/l	30 mg/l	Monthly	Composite

The pH shall not be less than 6.0 standard units nor greater than 9.5 standard units and shall be monitored continuously. Report range.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: sample point 002A, discharge point of waste treatment facility.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

3. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 002 - treatment facility discharge, contact and non-contact cooling waters, stormwater.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow, MGD	Report	Report	Continuous	Total Daily
Total Copper	285 grams/day	542 grams/day	Weekly	Composite
Total Lead	37 grams/day	42 grams/day	Weekly	Composite
Total Nickel	362 grams/day	548 grams/day	Weekly	Composite
Total Zinc	174 grams/day	416 grams/day	Weekly	Composite
TSS	20 mg/l	30 mg/l	Weekly	Composite
Oil and Grease	-	15 mg/l	Weekly	Grab
Temperature	-	90°F (32.2°C)	Weekly	Grab
TTO ¹	-	Report	Monthly	Grab

The pH shall not be less than 6.5 standard units nor greater than 8.5 standard units and shall be monitored daily by grab sample. Report range.

There shall be no discharge of floating solids, visible foam or oil sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: 002, discharge point to the Acushnet River.

¹ For TTO definition and monitoring requirements, see page 7 of 9.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

4. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 004B - discharge from the Gale Oil Separator.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow, MGD	Report	Report	Continuous	Total Daily
Total Copper	192 grams/day	364 grams/day	Monthly	Composite
Total Lead	24 grams/day	28 grams/day	Monthly	Composite
Total Nickel	242 grams/day	368 grams/day	Monthly	Composite
Total Zinc	116 grams/day	280 grams/day	Monthly	Composite
Oil and Grease	-	15 mg/l	Weekly	Grab
TSS	20 mg/l	30 mg/l	Monthly	Composite
TT0 ¹	-	Report	Monthly	Grab

The pH shall not be less than 6.5 standard units nor greater than 8.5 standard units and shall be monitored monthly by grab sample. Report range.

There shall be no discharge of floating solids, visible foam or oil sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: 004B, discharge from the Gale Oil Separator.

¹ for TTV definition and monitoring requirements, see page 7 of 9.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

5. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 004C - discharge from Gale Oil Separator, sanitary wastewater*, non-contact cooling water, and stormwater.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow, MGD	-	Report	Monthly	Estimate Total Daily
Temperature	-	90°F (32.2°C)	Monthly	Grab

The pH shall not be less than 6.5 standard units nor greater than 8.5 standard units and shall be monitored monthly by grab sample. Report range.

There shall be no discharge of floating solids or visible foam or oil sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: 004C, discharge point to the Acushnet River.

- * After completion of the extension of the City of New Bedford sanitary sewer to the sewer line at Wamsutta Street, there shall be no discharge of sanitary wastewater to discharge 004C.

Total Toxic Organics

The term "Total Toxic Organics" (TTO) is the summation of all quantifiable values greater than 0.01 milligrams per liter (mg/l) for the following toxic organics:

Acenaphthene
Acrolein
Acrylonitrile
Benzene
Benzidine
Carbon tetrachloride
(tetrachloromethane)
Chlorobenzene
1,2,4-trichlorobenzene
Hexachlorobenzene
1,2-dichloroethane
1,1,1-trichloroethane
Hexachloroethane
1,1-dichloroethane
1,1,2-trichloroethane
1,1,2,2-tetrachloroethane
Chloroethane
Ea (2-chloroethyl) ether
2-chloroethyl vinyl ether
(mixed)
2-chloronaphthalene
2,4,6-trichlorophenol
Parachlorometa cresol
Chloroform (trichloromethane)
2-chlorophenol
1,2-dichlorobenzene
N-nitrosodi-n-propylamine
Pentachlorophenol
Phenol
Bis (2-ethylhexyl) phthalate
Butyl benzyl phthalate
Di-n-butyl phthalate
Di-n-octyl phthalate
Diethyl phthalate
Dimethyl phthalate
1,2-benzanthracene
(benzo(a)anthracene)
Benzo(a)pyrene (3,4-benzopyrene)
3,4-Benzofluoranthene
(benzo(b)fluoranthene)
1,1,2-benzofluoranthene
(benzo(k)fluoranthene)
Chrysene

Acenaphthylene
Anthracene
1,12-benzoperylene
(benzo(ghi)perylene)
Fluorene
Pbenanthrene
1,2,5,6-dibenzanthracene
(dibenzo(a,b)anthracene)
Indeno(1,2,3-cd) pyrene
(2,3-o-phenylene pyrene)
Pyrene
Tetrachloroethylene
Toluene
1,3-dichlorobenzene
1,4-dichlorobenzene
3,3-dichlorobenzidine
1,1-dichloroethylene
1,2-trans-dichloroethylene
2,4-dichlorophenol
1,2-dichloropropane
(1,3-dichloropropene)
2,4-dimethylphenol
2,4-dinitrotoluene
2,6-dinitrotoluene
1,2-diphenylhydrazine
Ethylbenzene
Fluoranthene
4-chlorophenyl phenyl ether
4-bromophenyl phenyl ether
Bis (2-chloroisopropyl) ether
Bis (2-chloroethoxy) methane
Methylene chloride
(dichloromethane)
Methyl chloride
(chloromethane)
Methyl bromide (bromomethane)
Bromoform (tribromomethane)
Dichlorobromomethane
Chlorodibromomethane
Hexachlorobutadiene
Hexachlorocyclopentadiene
Isophorone

Naphthalene
Nitrobenzene
2-nitrophenol
4-nitrophenol
2,4-dinitrophenol
4,6-dinitro-o-cresol
N-nitrosodimethylamine
N-nitrosodiphenylamine
Trichloroethylene
Vinyl chloride (chloroethylene)
Aldrin
Dieldrin
Chlordane (technical mixture and
metabolites)
4,4-DDT
4,4-DDE (p,p-DDX)
4,4-DDD (p,p-TDE)
Alpha-endosulfan
Beta-endosulfan
Endosulfan sulfate
Endrin
Endrin aldehyde
Heptachlor
Heptachlor epoxide
(EHC-hexachlorocyclohexane)
Alpha-EHC
Beta-EHC
Gamma-EHC
Delta-EHC
(PCB-polychlorinated biphenyls)
PCB-1242 (Arochlor 1242)
PCB-1254 (Arochlor 1254)
PCB-1221 (Arochlor 1221)
PCB-1232 (Arochlor 1232)
PCB-1248 (Arochlor 1248)
PCB-1260 (Arochlor 1260)
PCB-1016 (Arochlor 1016)
Toxaphene
2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD)

In monitoring for Total Toxic Organics, the permittee need analyze for only those pollutants which would reasonably be expected to be present. The permittee may make the following certification on its monitoring reports in lieu of conducting an analysis: "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitations for total toxic organics (TTO). I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the solvent management plan submitted to the permitting authority."

In requesting the certification alternative, the permittee shall submit a solvent management plan that specifies, to the satisfaction of the permitting authority: the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and the procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater. This plan shall become a part of and an enforceable provision of this permit.

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Permit No. MA0004821

B. MONITORING AND REPORTING

1. Reporting

Monitoring results obtained during the previous month shall be summarized for each month and reported on separate Discharge Monitoring Report Form(s) postmarked no later than the 15th day of the month following the completed reporting period. The first report is due on the 15th day of the month following the effective date of the permit.

Signed copies of these, and all other reports required herein, shall be submitted to the Director at the following address:

Permit Compliance Section
Compliance Branch
Water Management Division
Environmental Protection Agency
JFK Federal Building
Boston, MA 02203

Duplicate signed copies of all monitoring reports shall be submitted to the State at:

Massachusetts Department of Environmental Quality Engineering
Massachusetts Division of Water Pollution Control
Southeastern Regional Office
Lakeville Hospital
Lakeville, Massachusetts 02346

Signed copies of all other notifications and reports required by this permit shall be submitted to the State at:

Massachusetts Department of Environmental Quality Engineering
Massachusetts Division of Water Pollution Control
Regulatory Branch
1 Winter Street
Boston, Massachusetts 02108

DRAFT

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Permit No. MA0004821

C. STATE PERMIT CONDITIONS

This Discharge Permit is issued jointly by the U. S. Environmental Protection Agency, and the Division of Water Pollution Control under Federal and State law, respectively. As such, all the terms and conditions of this permit are hereby incorporated into and constitute a discharge permit issued by the Director of the Massachusetts Division of Water Pollution Control pursuant to M.G.L. Chap. 21, §43.

Each Agency shall have the independent right to enforce the terms and conditions of this Permit. Any modification, suspension or revocation of this Permit shall be effective only with respect to the Agency taking such action, and shall not affect the validity or status of this Permit as issued by the other Agency, unless and until each Agency has concurred in writing with such modification, suspension or revocation. In the event any portion of this Permit is declared, invalid, illegal or otherwise issued in violation of State law such permit shall remain in full force and effect under Federal law as an NPDES Permit issued by the U. S. Environmental Protection Agency. In the event this Permit is declared invalid, illegal or otherwise issued in violation of Federal law, this Permit shall remain in full force and effect under State law as a Permit issued by the Commonwealth of Massachusetts.

ATTACHMENT 2

AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Clean Water Act, as amended, (33 U.S.C. §§1251 et seq.; the "CWA"), and the Massachusetts Clean Waters Act, as amended, (M.G.L. Chap. 21, §§26-53),

Town of Fairhaven
Board of Public Works
Water Pollution Control Facility

is authorized to discharge from the facility located at

Arsene Street
Fairhaven, Massachusetts 02719

to receiving waters named

Acushnet River

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

This permit shall become effective on the date of the signature below.

This permit and the authorization to discharge expire at midnight, five years from the effective date.

This permit supersedes the permit issued on March 7, 1977.

This permit consists of 6 pages in Part I including effluent limitations, monitoring requirements, etc., and 19 pages in Part II including General Conditions and Definitions.

Signed this 12th day of June, 1984



David B. Fiene
Director
Water Management Division
Environmental Protection Agency
Region I
Boston, MA



Thomas C. McMahon
Director, Division of Water
Pollution Control
Department of Environmental
Quality Engineering
Commonwealth of Massachusetts
Boston, MA

PART 1 FINAL LIMITATIONS

FIG. 1. ANX Original
 Filigation Document

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning effective date and lasting through expiration the permittee is authorized to discharge from outfall serial number 001 (Treatment Plant Effluent).

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations ¹						Monitoring Requirements	
	kg/day (lbs/day)			(specify units)			Measurement Frequency	Sample Type
	Average Monthly	Average Weekly	Maximum ¹ Daily	Average Monthly	Average Weekly	Maximum Daily		
Flow-m ³ /Day (MGD)	-	-	-	18925.0 (5.0)	-	-	Continuous	See Footnote 2
BOD	-	-	-	30 mg/l	45 mg/l	50 mg/l	Weekly	24 Hr. Comp.
TSS	-	-	-	30 mg/l	45 mg/l	50 mg/l	Weekly	24 Hr. Comp.
Settleable Solids	-	-	-	0.1 ml/l	-	0.3 ml/l	Daily	Grab
pH	-	-	-	(See A1.a on page 3)			Daily	Grab
Fecal Coliform Bacteria ³	-	-	-	200/100ml	400/100ml	400/100ml	Weekly	Grab
Chlorine Residual ^{3,4}	-	-	-	0.5 mg/l (min.) to 1.5 mg/l (max.) after 15 minute peak hourly flow			3/Day	Grab ⁴

The discharge shall not cause a violation of the water quality standards of the receiving waters.

Footnotes

- 1) Required for state certification.
- 2) Report maximum and minimum daily rates and total flow for each operating date.
- 3) Fecal Coliform Bacteria and Chlorine Residual requirements are seasonal and shall be effective from April 1 to October 15 each year.
- 4) Chlorine residual shall be tested at a downstream reach of the outfall pipe equivalent to 15 minutes retention. An alternative location/procedure may be approved provided that the permittee demonstrates a consistent correlation with samples collected from the outfall.

U.S. v. AVX Original
Litigation Document

- a. The pH of the effluent shall not be less than 6.5 nor greater than 8.5 at any time, unless these values are exceeded due to natural causes or as a result of the approved treatment processes.
 - b. The discharge shall not cause objectionable discoloration of the receiving waters.
 - c. The effluent shall contain neither a visible oil sheen, foam, nor floating solids at any time.
 - d. The permittee's treatment facility shall maintain a minimum of 85 percent removal of both total suspended solids and biochemical oxygen demand. The percent removal shall be based on monthly average values.
 - e. When the effluent discharged for a period of 90 consecutive days exceeds 80 percent of the designed flow, the permittee shall submit to the permitting authorities a projection of loadings up to the time when the design capacity of the treatment facility will be reached, and a program for maintaining satisfactory treatment levels consistent with approved water quality management plans. ;
2. All POTWs must provide adequate notice to the Director of the following:
- a. Any new introduction of pollutants into that POTW from an indirect discharger in a primary industry category discharging process water; and
 - b. Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.
 - c. For purposes of this paragraph, adequate notice shall include information on:
 - (1) the quality and quantity of effluent introduced into the POTW; and
 - (2) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

3. Development of Limitations for Industrial Users:

- a. Pollutants introduced into POTW's by a nondomestic source (user) shall not Pass Through the POTW or Interfere with the operation or performance of the works.
- b. All POTW's shall, in cases where pollutants contributed by User(s) result in Interference or Pass-Through, and such violation is likely to recur, develop and enforce specific effluent limits for Industrial User(s), and all other users, as appropriate, which together with appropriate changes in the POTW Treatment Plant's Facilities or operation, are necessary to ensure renewed and continued compliance with the POTW's NPDES permit or sludge use or disposal practices. Specific effluent limits shall not be developed and enforced without individual notice to persons or groups who have requested such notice and an opportunity to respond.
- c. Where specific prohibitions or limits on pollutants or pollutant parameters are developed by a POTW in accordance with paragraph (b) above such limits shall be deemed Pretreatment Standards for the purposes of section 307(d) of the Act.
- d. If, within 30 days after notice of an Interference or Pass Through violation has been sent by EPA to the POTW, and to persons or groups who have requested such notice, the POTW fails to commence appropriate enforcement action to correct the violation, EPA may take appropriate enforcement action.

C. MONITORING AND REPORTING

1. Reporting

Monitoring results obtained during the previous month shall be summarized for each month and reported on separate Discharge Monitoring Report Form(s) postmarked no later than the 15th day of the month following the completed reporting period. The first report is due on the 15th day of the month following the effective date of the permit.

Signed copies of these, and all other reports required herein, shall be submitted to the Director at the following address:

Permit Compliance Section
Compliance Branch (WR/PC)
Water Management Division
Environmental Protection Agency
JFK Federal Building
Boston, MA 02203

Duplicate signed copies of all monitoring reports shall be submitted to the State at:

Massachusetts Department of Environmental Quality Engineering
Massachusetts Division of Water Pollution Control
Southeastern Regional Office
Lakeville Hospital
Lakeville, Massachusetts 02346

Signed copies of all other notifications and reports required by this permit shall be submitted to the State at:

Massachusetts Department of Environmental Quality Engineering
Massachusetts Division of Water Pollution Control
Regulatory Branch
1 Winter Street
Boston, Massachusetts 02108

D. STATE PERMIT CONDITIONS

This Discharge Permit is issued jointly by the U. S. Environmental Protection Agency and the Division of Water Pollution Control under Federal and State law, respectively. As such, all the terms and conditions of this permit are hereby incorporated into and constitute a discharge permit issued by the Director of the Massachusetts Division of Water Pollution Control pursuant to M.G.L. Chap. 21, Section 43.

Each agency shall have the independent right to enforce the terms and conditions of this Permit. Any modification, suspension or revocation of this Permit shall be effective only with respect to the Agency taking such action, and shall not affect the validity or status of this Permit as issued by the other Agency, unless and until each Agency has concurred in writing such modification, suspension or revocation. In the event any portion of this Permit is declared invalid, illegal or otherwise issued in violation of State law such permit shall remain in full force and effect under Federal law as an NPDES Permit issued by the U. S. Environmental Protection Agency. In the event this Permit is declared invalid, illegal or otherwise issued in violation of Federal law, this Permit shall remain in full force and effect under State law as a Permit issued by the Commonwealth of Massachusetts.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203

FACT SHEET

DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT
TO DISCHARGE TO WATERS OF THE UNITED STATES

NPDES PERMIT NO.: MA0100765

STATE PERMIT NO.: M-13

NAME AND ADDRESS OF APPLICANT:

Alfred F. Raphael, Supervisor and Chief Operator
Arsene Street
Fairhaven, MA 02719

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

Fairhaven Water Pollution Control Facility
Arsene Street
Fairhaven, MA

RECEIVING WATER: Acushnet River (New Bedford Harbor)

CLASSIFICATION: (SB)

I. Proposed Action, Type of Facility, and Discharge Location.

The above named applicant has applied to the U.S. Environmental Protection Agency for reissuance of a NPDES permit to discharge into the designated receiving water. The facility is engaged in the collection of municipal wastewater. The discharge is from a 5.0 MGD secondary wastewater treatment facility.

II. Description of Discharge.

A quantitative description of the discharge in terms of significant effluent parameters based, based on discharge monitoring report data from July 1982 to June 1983, is presented on Attachment 1.

III. Limitations and Conditions with Administrative Order.

The final effluent limitations and monitoring requirements in the draft permit, and the interim limitations, interim monitoring requirements, and compliance schedule EPA proposes to issue in an Administrative Order subsequent to permit issuance may be found on the following attachments:

- 2 - Draft Permit
- 3 - Administrative Order Schedule
- 4 - Administrative Order Interim Limitations and Monitoring Requirements

IV. Permit Basis and Explanation of Effluent Limitation Derivation.

The "Average Monthly" and "Average Weekly" BOD and TSS limitations are based on the secondary treatment requirements of Section 301(b) (1)(B) of the Clean Water Act (CWA) as defined in 40 CFR 133.102. The "Maximum Daily" BOD and TSS limitations and the limitations for settleable solids, pH, fecal coliform, and residual chlorine are based on Massachusetts state certification requirements under Section 401(a)(1) of the CWA, as defined in 40 CFR 124.53 and 124.56, and water quality standards.

The effluent monitoring requirements have been specified in accordance with 40 CFR 122.41(j), 122.44(i) and 122.48 to yield data representative of the discharge.

The facility has a history of Maximum Daily BOD, Average Monthly TSS and Maximum Daily TSS violations (refer to Attachment 1). These violations have been attributed to problems with infiltration/inflow into the treatment facility.

An Administrative Order will be issued with a Compliance Schedule since this community does not qualify for an extension of the secondary treatment deadline in accordance with Section 301(i) of the CWA.

The general conditions of the permit are based on 40 CFR Parts 122 (Subparts A and D) and 124 (Subparts A, D, E and F) and consist primarily of management requirements common to all permits.

V. State Certification Requirements.

EPA may not issue a permit unless the State Water Pollution Control Agency with jurisdiction over the receiving waters certifies that the effluent limitations contained in the permit are stringent enough to assure that the discharge will not cause the receiving water to violate State Water Quality Standards. The staff of the Massachusetts Division of Water Pollution Control Commission has reviewed the draft permit and advised EPA that the limitations are adequate to protect water quality. EPA has requested permit certification by the State and expects that the draft permit will be certified.

VI. Comment Period, Hearing Requests, and Procedures for Final Decisions.

All persons, including applicants, who believe any condition of the draft permit is inappropriate must raise all issues and submit all available arguments and all supporting material for their arguments in full by the close of the public comment period, to the U.S. EPA, Compliance Branch, JFK Federal Building, Boston, Massachusetts 02203. Any person, prior to such date, may submit a request in writing for a public hearing to consider the draft permit to EPA and the State Agency. Such requests shall state the nature of the issues proposed to be raised in the hearing. A public hearing may be held after at least thirty days public notice whenever the Regional Administrator finds that response to this notice indicates significant public interest. In reaching a final decision on the draft permit, the Regional Administrator will respond to all significant comments and make these responses available to the public at EPA's Boston office.

Following the close of the comment period, and after a public hearing, if such hearing is held, the Regional Administrator will issue a final permit decision and forward a copy of the final decision to the applicant and each person who has submitted written comments or requested notice. Within 30 days following the notice of the final permit decision any interested person may submit a request for a formal hearing to reconsider or contest the final decision. Requests for formal hearings must satisfy the requirements of 40 C.F.R. §124.74, 48 Fed. Reg. 14279-14280 (April 1, 1983).

VII. EPA Contact.

Additional information concerning the draft permit may be obtained between the hours of 9:00 a.m. and 5:00 p.m., Monday through Friday, excluding holidays from:

Gerald C. Potamis, P.E.
Massachusetts State Coordinator (WR/MP-2103)
John F. Kennedy Federal Building
Boston, Massachusetts 02203
Telephone: (617)223-3949

February 23, 1984

Date

David A. Fierra, Director
Water Management Division
Environmental Protection Agency

ATTACHMENT 1

SUMMARY OF DMR DATA

Arsene Street WWTP, Fairhaven, MA
Discharge 001

PARAMETER		PERMIT LIMITS.	JULY	AUG.	1982 SEPT.	OCT.	NOV.	DEC.	JAN.	FEB.	1983 MAR.	APR.	MAY	JUNE	AVG.
Flow (MGD)	AVG.	2.10	1.53	1.5	1.6	1.48	1.67	3.06	2.64	3.16	4.5	3.65	2.15	2.05	2.42
	MAX.	-	2.21	3.34	2.96	1.88	2.85	4.29	4.3	6.49	9.59	6.88	2.38	4.99	4.35
BOD (mg/l)	AVG.	30	30.5	11.6	11.4	6.5	25.3	20.1	21.1	11.5	20.7	16.7	18.8	43.5	19.8
	MAX.	50	81	36	37.2	8.7	38.4	68.4	40	16.5	60	33	70.8	114	50.3
TSS (mg/l)	AVG.	30	54.4	40	24.2	13.9	99	60.4	37.7	19.5	28.3	28.3	27.1	106.8	45.0
	MAX.	50	216	228	88	38	272	340	60	52	116	88	68	244	150.8
SS (ml/l)	AVG.	0.1	<0.01	<0.01	<0.01	<0.01	6.67	<0.01	0.1	<0.01	<0.01	0.03	<0.01	0.24	-
	MAX.	0.3	<0.01	<0.01	<0.01	<0.01	40	<0.01	40	<0.01	<0.01	1.0	<0.01	4.0	-
Tot. Coliform (# /100 ml)															
	AVG.	1000	1054	648	3151	530	24K	24K	24K	24K	24K	513	1243	337	10,6
	MAX.	2000	24K	24K	9200	3500	24K	24K	24K	24K	24K	5400	9200	1700	34,416
pH (S.U.)	AVG.	6.0	7.0	7.1	6.6	6.7	6.7	6.6	6.8	6.8	6.8	6.3	6.6	6.4	6.3*
	MAX.	9.0	7.8	7.5	7.5	7.2	7.1	7.1	7.4	7.4	7.6	7.4	7.3	7.4	7.8*
Chlorine Residual (mg/l)															
	AVG.	-	2.0	0.5	2.2	2.29	-	-	-	-	-	2.27	2.65	2.0	2.0
	MAX.	-	2.0	2.5	3.0	3.5	-	-	-	-	-	3.0	3.5	2.5	2.9

* Maximum and minimum pH values recorded during report period.

Permit No.
MA0100765

Attachment III
Administrative Order Schedule
Permit No. MA0100765
Fairhaven, Massachusetts

SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the effluent limitations and/or conditions specified for discharges in accordance with the following schedule:
 - a. By July 1, 1984, the Permittee will begin design of the following items in accordance with the EPA and State approved Facilities Plan and Sewer System Evaluation Report.
 - (1) Expansion and improvements to the existing wastewater treatment facility.
 - (2) Rehabilitation of the Sewerage System to eliminate or reduce the quantities of Infiltration/Inflow.
 - (3) Development of a Septic System Management Program.
 - b. By July 1, 1985, the Permittee will begin design of the expansion of the wastewater collection system.
 - c. By July 1, 1985, begin construction of and by May 1, 1988, complete construction of above items.
 - d. By June 15, 1988, obtain operation limits of the expanded wastewater treatment facilities.
 - e. By June 15 of each year, provide EPA and the State with a status report on the above items.
2. No later than 14 calendar days following a date identified in any schedule of compliance, the permittee shall submit to the Director, either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

ATTACHMENT IV
ADMINISTRATIVE ORDER INTERIM LIMITATIONS AND MONITORING REQUIREMENTS
Permit No. MA0100765, Fairhaven, Massachusetts

INTERIM EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning effective date and lasting through June 14, 1988¹, the permittee is authorized to discharge from outfall serial number 001 (wastewater treatment facility).

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>kg/day (lbs/day)</u>		<u>Discharge Limitations</u> (specify units)			<u>Monitoring Requirements</u>	
	<u>Average Monthly</u>	<u>Average Weekly</u>	<u>Average Monthly</u>	<u>Average Weekly</u>	<u>Maximum Daily</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow-m ³ /Day (MGD)			(2.10)			Continuous	See Footnote 2
BOD			30 mg/l		50 mg/l	Weekly	24 Hr.Composite
TSS			<u>50 mg/l</u>		200 mg/l	Weekly	24 Hr.Composite
Settleable Solids ³			0.1 ml/l		0.3 ml/l	Daily	Grab
pH ³			(See A1.a on page 3 of 6)			Daily	Grab
Fecal Coliform Bacteria ^{3,4}			200/100ml	400/100ml	400/100ml	Weekly	Grab
Chlorine Residual ^{3,4}			0.5mg/l (min) to 1.5mg/l (max) after 15 minutes peak hourly flow			3/Day	Grab

Footnotes:

- 1) See Administrative Order Schedule.
- 2) Report maximum and minimum daily rates and total flow for each operating date.
- 3) Required for state certification.
- 4) Fecal coliform bacteria and chlorine residual requirements are seasonal and shall be effective from April 1 to October 31 each year.

Federal Permit No. MA0024341
State Permit No. 663
State Application No. 1026

DISCHARGE PERMIT

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et. seq; the "Act"), and the Massachusetts Clean Waters Act, as amended, (M.G.L., C.21, §§26-53),

'Skipper Motor Inn, Inc.

is authorized to discharge from a facility located at

110 Middle Street
Fairhaven, MA

to receiving waters named

Acushnet River

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof.

This permit shall become effective ~~on~~ 45 days from the date of signatures.

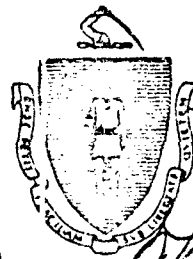
This permit and the authorization to discharge shall expire at midnight, April 30, 1983.

Signed this 3 day of July, 1978,



Leslie Carothers

Leslie Carothers, Director
Enforcement Division
Environmental Protection Agency



Thomas C. McMahon

Thomas C. McMahon, Director
Division of Water Pollution Control
Commonwealth of Massachusetts

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning effective date and lasting through expiration date the permittee is authorized to discharge from outfall(s) serial number(s) 001 (swimming pool backflush)

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kg/day (lbs/day)		Other Units (Specify)		Measurement Frequency	Sample Type
	Daily Avg	Daily Max	Daily Avg	Daily Max		
Flow—m ³ /Day (GPD)	—	—	—	4 (1,000)	quarterly*	daily total
Cl ₂	-	-	-	1.5 mg/l	quarterly*	grab
Settleable Solids	-	-	0.1 ml/l	0.3 ml/l	monthly*	grab

*during discharge

~~The pH shall not be less than standard units nor greater than standard units and shall be monitored~~

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Discharge point

The discharge shall not cause a violation of the water quality standards of the receiving waters.

B. MONITORING AND REPORTING**1. Representative Sampling**

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. Reporting

Monitoring results obtained during the previous 3 months shall be summarized quarterly & reported on a Discharge Monitoring Report Form (OMB#158-R0073), postmarked no later than the 28th day of the month following the completed reporting period. The first report is due on May 28, 1978*. Duplicate signed copies of these, and all other reports required herein, shall be submitted to the Regional Administrator and the State at the following addresses:

Environmental Protection Agency
Region I - Permits Branch
P.O. Box 8127
Boston, MA 02114

Massachusetts Division of Water
Pollution Control
Southeastern Regional Office.
P.O. Box 537
North Pembroke, MA 02358

*Subsequent reports due August 28, November 28, February 28 & May 28 each year.

3. Definitions

See attached sheets also.

~~a. The "daily average" discharge means the total discharge by weight during a calendar month divided by the number of days in the month that the production or commercial facility was operating. Where less than daily sampling is required by this permit, the daily average discharge shall be determined by the summation of all the measured daily discharges by weight divided by the number of days during the calendar month when the measurements were made.~~

~~b. The "daily maximum" discharge means the total discharge by weight during any calendar day.~~

4. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act, under which such procedures may be required.

5. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The exact place, date, and time of sampling;
- b. The dates the analyses were performed;
- c. The person(s) who performed the analyses;

PART I

Page 4. of 8

Permit No. MA0024341

d. The analytical techniques or methods used; and

e. The results of all required analyses.

6. *Additional Monitoring by Permittee*

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report Form (OMB#158-R0073). Such increased frequency shall also be indicated.

7. *Records Retention*

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the State water pollution control agency.

A. MANAGEMENT REQUIREMENTS

1. *Change in Discharge*

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions, production increases, or process modifications which will result in new, different, or increased discharges of pollutants must be reported by submission of a new NPDES application or, if such changes will not violate the effluent limitations specified in this permit, by notice to the permit issuing authority of such changes. Following such notice, the permit may be modified to specify and limit any pollutants not previously limited.

2. *Noncompliance Notification*

If, for any reason, the permittee does not comply with or will be unable to comply with any daily maximum effluent limitation specified in this permit, the permittee shall provide the Regional Administrator and the State with the following information, in writing, within five (5) days of becoming aware of such condition:

- a. A description of the discharge and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

3. *Facilities Operation*

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

4. *Adverse Impact*

The permittee shall take all reasonable steps to minimize any adverse impact to navigable waters resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

5. *Bypassing*

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except (i) where unavoidable to prevent loss of life or severe property damage, or (ii) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the effluent limitations and prohibitions of this permit. The permittee shall promptly notify the Regional Administrator and the State in writing of each such diversion or bypass.

PART II

Page 6 of 8

Permit No. MA0024341

6. *Removed Substances*

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering navigable waters.

7. *Power Failures*

In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

- a. In accordance with the Schedule of Compliance contained in Part I, provide an alternative power source sufficient to operate the wastewater control facilities;

or, if such alternative power source is not in existence, and no date for its implementation appears in Part I,

- b. Halt, reduce or otherwise control production and/or all discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

B. RESPONSIBILITIES

1. *Right of Entry*

The permittee shall allow the head of the State water pollution control agency, the Regional Administrator, and/or their authorized representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any discharge of pollutants.

2. *Transfer of Ownership or Control*

In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Regional Administrator and the State water pollution control agency.

3. *Availability of Reports*

Except for data determined to be confidential under Section 308 of the Act, all reports prepared in accordance with the terms of this permit shall be available for public

PART II

Page 7 of 8

Permit No. MA0024341

inspection at the offices of the State water pollution control agency and the Regional Administrator. As required by the Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Act.

4. *Permit Modification*

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

- a. Violation of any terms or conditions of this permit;
- b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. *Toxic Pollutants*

Notwithstanding Part II, B-4 above, if a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the Act for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the permittee so notified.

6. *Civil and Criminal Liability*

Except as provided in permit conditions on "Bypassing" (Part II, A-5) and "Power Failures" (Part II, A-7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

7. *Oil and Hazardous Substance Liability*

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Act.

8. *State Laws*

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Act.

PART II

Page 8 of 8

Permit No. MA0024341

9. *Property Rights*

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

10. *Severability*

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

PART III

OTHER REQUIREMENTS

FOR PURPOSES OF THIS PERMIT, THE FOLLOWING TERMS SHALL APPLY.

Monthly Average - The mean value of the analyses of the total number of samples collected during a month.

Daily Maximum - The maximum value of any one grab sample collected in a normal operating day.

Grab Sample - An individual sample collected in a period of less than 15 minutes.

Composite Sample - A sample consisting of a minimum of eight grab samples collected at regular intervals over a normal operating day and combined proportional to flow, or a sample continuously collected proportional to flow over a normal operating day.

Implementation Schedule - An abatement program consisting of:

a. A plan of intended design, construction, and operation of new or modified facilities to treat the effluent; and

b. A timetable setting forth the dates by which all sources of water pollution must be in compliance with the effluent limitations of this permit. This schedule shall include (if appropriate) interim and final dates to accomplish:

- (1) Completion of preliminary plans and engineering report
- (2) Completion of final plans
- (3) Contract award
- (4) Commencement of construction
- (5) Completion of construction and commencement of operation
- (6) Attainment of operational level

The following abbreviations, when used, are defined below.

mg/l	milligrams per liter
ug/l	micrograms per liter
lbs/day	pounds per day
kg/day	kilograms per day
Temp. °C	temperature in degrees Centigrade
Temp. °F	temperature in degrees Fahrenheit
Turb.	turbidity measured in Jackson Candle Units (JTU)

TNFR or TSS	total nonfilterable residue or total suspended solids
BOD	five-day biochemical oxygen demand unless otherwise specified
TKN	total Kjeldahl nitrogen as nitrogen
NH ₃ -N	ammonia nitrogen as nitrogen
Total P	total phosphorus as phosphorus
COD	chemical oxygen demand
TOC	total organic carbon
Surfactant	surface-active agent
pH	a measure of the hydrogen ion concentration
PCB	polychlorinated biphenyl
m ³ /Day	cubic meters per day
MGD	million gallons per day
Oil & Grease	hexane extractable material
Total Coliform	total coliform bacteria
Fecal Coliform	total fecal coliform bacteria
ml	milliliter(s)
ml/l	milliliter(s) per liter
SU	standard units
NO ₃ -N	nitrate nitrogen as nitrogen
NO ₂ -N	nitrite nitrogen as nitrogen
NO ₂ & NO ₃	combined nitrite and nitrate nitrogen as nitrogen
Cl ₂	total residual chlorine



REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

Date: FEBRUARY 2, 1978

Mr. Thomas C. McMahon, Director
Division of Water Pollution Control
110 Tremont Street
Boston, MA 02202

Dear Mr. McMahon:

Attached for MDWPC's preliminary review are the following draft NPDES Permits and/or ECSL letters. Please contact the appropriate members of the Permits Branch with your comments as soon as possible. Once we have received your comments the draft permits will be sent to the permittee, etc.

Sincerely yours,

Edward J Conley

Chief, Permits Branch

NPDES NUMBER

PERMIT NAME

1. MA0024341
- MA0026051
2. MA0004847

→ SKIPPER MOTOR INN., INC.
MARINE RESEARCH INC.
CANAL MARINE., INC.

3.

4.

5.

Comments to EPA 3/30/78
Skipper Motor Inn, Inc. - Fairhaven - 663 OK! m.g.o.

As this sounds like a filter backwash, I would require additional monthly monitoring, during discharge, of settleable solids not to exceed 0.1 ml/l daily average, 0.3 ml/l daily maximum. Also, Bourne Mass. Maritime Academy was limited to 0.1 mg/l chlorine residual for a swimming pool into the Cape Cod Canal which seems a more reasonable limit for such a discharge.

varies between 0.1 & 0.2 mg/l in permits.
I've used 1.5 mg/l consistently for
chlorinated effluents, usually from
municipalities. m.g.o'Brien

DISCHARGE PERMIT

~~AUTHORIZATION TO DISCHARGE UNDER THE~~
~~NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM~~

U.S. v. AVX Original
Litigation Document

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et. seq; the "Act"), and the Massachusetts Clean Waters Act, as amended, (M.G.L., C.21, §§26-53),

Teledyne Rodney Metals

is authorized to discharge from a facility located at

1357 East Rodney French Boulevard
New Bedford, MA 02742

to receiving waters named

Buzzard's Bay

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof.

This permit shall become effective on the 45th day after date of signature

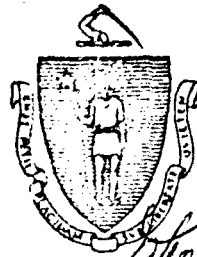
This permit and the authorization to discharge shall expire at midnight, 5 years from date of issuance.

Signed this 20 day of March, 1978.



Leslie Carothers

Leslie Carothers, Director
Enforcement Division
Environmental Protection Agency



Thomas C. McMahon

Thomas C. McMahon, Director
Division of Water Pollution Control
Commonwealth of Massachusetts

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning effective date and lasting through expiration
the permittee is authorized to discharge from outfall(s) serial number(s) 001

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kg/day (lbs/day)		Other Units (Specify)		Measurement* Frequency	Sample Type
	Daily Avg	Daily Max	Daily Avg	Daily Max		
Flow - M ₃ /day (MGD)	-	-	(0.75)	-	quarterly	estimate
Temperature °C (°F)	-	-	-	35.6 (96)	quarterly	Daily Avg.
	-	-	-			

Allowable Temperature Increase- none except where the increase will not exceed the recommended limit on the most sensitive receiving water use.

*Except that four grab samples are to be taken at regular intervals during one normal operating day in both August and September.

The pH shall not be less than 6.8 standard units nor greater than 8.5 standard units and shall be monitored quarterly (report range)

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

discharge 001

C. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. Reporting

Monitoring results obtained during the previous 6 months shall be summarized for each quarter and reported on a Discharge Monitoring Report Form (EPA No. 3320-1), postmarked no later than the 28th day of the month following the completed reporting period. The first report is due on August 10, 1978. Duplicate signed copies of these, and all other reports required herein, shall be submitted to the Regional Administrator and the State at the following addresses:

Environmental Protection Agency
Region I - Permits Branch
P.O. Box 8127
Boston, MA 02114

Massachusetts Division of Water
Pollution Control
110 Tremont Street
Boston, MA 02108

3. ~~Definitions~~ See Attached Sheets

~~a. The "daily average" discharge means the total discharge by weight during a calendar month divided by the number of days in the month that the production or commercial facility was operating. Where less than daily sampling is required by this permit, the daily average discharge shall be determined by the summation of all the measured daily discharges by weight divided by the number of days during the calendar month when the measurements were made.~~

b. The "daily maximum" discharge means the total discharge by weight during any ~~calendar day~~.

4. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act, under which such procedures may be required.

5. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The exact place, date, and time of sampling;
- b. The dates the analyses were performed;
- c. The person(s) who performed the analyses;

PART I

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Permit No. MA0003336

d. The analytical techniques or methods used; and

e. The results of all required analyses.

6. *Additional Monitoring by Permittee*

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report Form (EPA No. 3320-1). Such increased frequency shall also be indicated.

7. *Records Retention*

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the State water pollution control agency.

A. MANAGEMENT REQUIREMENTS**1. *Change in Discharge***

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions, production increases, or process modifications which will result in new, different, or increased discharges of pollutants must be reported by submission of a new NPDES application or, if such changes will not violate the effluent limitations specified in this permit, by notice to the permit issuing authority of such changes. Following such notice, the permit may be modified to specify and limit any pollutants not previously limited.

2. *Noncompliance Notification*

If, for any reason, the permittee does not comply with or will be unable to comply with any daily maximum effluent limitation specified in this permit, the permittee shall provide the Regional Administrator and the State with the following information, in writing, within five (5) days of becoming aware of such condition:

- a. A description of the discharge and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

3. *Facilities Operation*

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

4. *Adverse Impact*

The permittee shall take all reasonable steps to minimize any adverse impact to navigable waters resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

5. *Bypassing*

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except (i) where unavoidable to prevent loss of life or severe property damage, or (ii) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the effluent limitations and prohibitions of this permit. The permittee shall promptly notify the Regional Administrator and the State in writing of each such diversion or bypass.

6. *Removed Substances*

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering navigable waters.

7. *Power Failures*

In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

- a. In accordance with the Schedule of Compliance contained in Part I, provide an alternative power source sufficient to operate the wastewater control facilities;

or, if such alternative power source is not in existence, and no date for its implementation appears in Part I,

- b. Halt, reduce or otherwise control production and/or all discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

B. RESPONSIBILITIES

1. *Right of Entry*

The permittee shall allow the head of the State water pollution control agency, the Regional Administrator, and/or their authorized representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any discharge of pollutants.

2. *Transfer of Ownership or Control*

In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Regional Administrator and the State water pollution control agency.

3. *Availability of Reports*

Except for data determined to be confidential under Section 308 of the Act, all reports prepared in accordance with the terms of this permit shall be available for public

PART II

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inspection at the offices of the State water pollution control agency and the Regional Administrator. As required by the Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Act.

4. *Permit Modification*

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

- a. Violation of any terms or conditions of this permit;
- b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. *Toxic Pollutants*

Notwithstanding Part II, B-4 above, if a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the Act for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the permittee so notified.

6. *Civil and Criminal Liability*

Except as provided in permit conditions on "Bypassing" (Part II, A-5) and "Power Failures" (Part II, A-7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

7. *Oil and Hazardous Substance Liability*

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Act.

8. *State Laws*

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Act.

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9. *Property Rights*

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

10. *Severability*

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

PART III

OTHER REQUIREMENTS

THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION
DIVISION OF WATER POLLUTION CONTROL
LEVERETT SALTONSTALL BUILDING
BOSTON, MASSACHUSETTS 02202

U. S. ENVIRONMENTAL PROTECTION AGENCY
ENFORCEMENT DIVISION, PERMITS BRANCH
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203

FACT SHEET

FOR NPDES PERMIT APPLICATION TO DISCHARGE LIQUID EFFLUENT

PUBLIC NOTICE NUMBER: MA-27-76

PUBLIC COMMENT PERIOD: SEPTEMBER 2, 1975 - OCTOBER 2, 1975

APPLICANT NAME:	Teledyne Rodney Metals
MAILING ADDRESS:	1357 East Rodney French Blvd. New Bedford, MA 02742
APPLICATION NUMBERS:	NPDES Permit No. MA0003336 State Permit No. 34 State Application No. 549

This facility is engaged in the continuous annealing of stainless steel strip. The application pertains to 1 existing discharge, (average flow is 750,000 gpd), consisting of uncontaminated cooling water (SIC 493) to the Acushnet River-Buzzard's Bay, a Class SA watercourse, at New Bedford, Massachusetts. Class SA waters are defined as being suitable for all sea water uses, including shellfish harvesting for direct human consumption (approved shellfish areas), bathing, and other water contact sports. The existing permit allows the applicant to discharge 40,000 gpd of uncontaminated cooling water. The proposed modification will allow 750,000 gpd of uncontaminated cooling water. This permit will expire June 29, 1978.

PROPOSED PERMIT MODIFICATION

The following permit modification is proposed. The flow will be raised from 40,000 gpd to allow the permittee to withdraw uncontaminated cooling water from the New Bedford sewer system to which it is currently discharged.

TENTATIVE DECISION ON PROPOSED PERMIT MODIFICATION

The Regional Administrator and the Director have made a preliminary finding that the modification requested by the permittee will not violate State water quality standards and applicable provisions of the Federal Water Pollution Control Act as amended in 1972 (FWPCA) and have made a tentative decision to grant the modification requested.

Final effluent limits are based on water quality standards.

DESCRIPTION OF DISCHARGE

<u>Parameter</u>	<u>Average</u>	<u>Maximum</u>
001 Flow	750,000 gpd	750,000 gpd
Temperature	_____ Summer	_____
	_____ Winter	<u>estimate 96°F</u>

Other Pollutants

None

AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Clean Water Act, as amended, (33 U.S.C. §§1251 et seq.; the "CWA"), and the Massachusetts Clean Waters Act, as amended, (M.G.L. Chap. 21, §§26-53),

Acushnet Company, Golf Division

is authorized to discharge from the facility located at

Slocum Street
Acushnet, Massachusetts

to receiving waters named

Acushnet River

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

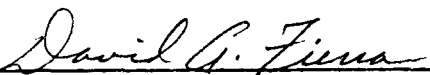
This permit shall become effective on date of signature.

This permit and the authorization to discharge expire at midnight, five years from date of issuance.

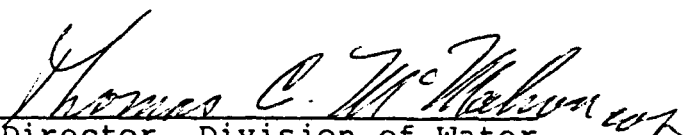
This permit supersedes the permit issued on June 4, 1975

This permit consists of 7 pages in Part I including effluent limitations, monitoring requirements, etc., and 19 pages in Part II including General Conditions and Definitions.

Signed this 20th day of November, 1986



Director
Water Management Division
Environmental Protection Agency
Region I
Boston, MA



Director, Division of Water
Pollution Control
Department of Environmental
Quality Engineering
Commonwealth of Massachusetts
Boston, MA

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number ~~1003~~, sanitary waste.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow-m ³ /Day (MGD)	-	-	Continuous	Daily Avg.
BOD	30 mg/l	50 mg/l	Monthly	Composite
TSS	30 mg/l	50 mg/l	Monthly	Composite
Oil & Grease	10 mg/l	15 mg/l	Monthly	Grab
Settleable Solids	-	.3 mg/l	Monthly	Grab
Fecal Coliform	200/100 ml	400/100 ml	Monthly	Grab

The pH shall not be less than 6.5 standard units nor greater than 8.5 standard units and shall be monitored continuously, report ranges.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: point of discharge.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

2. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 010 treated process waste, non-contact cooling water and boiler blowdown.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow-M ³ /Day (MGD)	-	-	Continuous	Daily Avg.
COD	Monitor		Monthly	Composite
Zinc	1.00 mg/l	2.61mg/l	Monthly	Composite
Total Suspended Solids	30 mg/l	50 mg/l	Monthly	Composite
Oil & Grease	10 mg/l	15 mg/l	Monthly	Grab
Temperature	-	92°F	Monthly	Grab
*TIO	-	2.13 mg/l	2/Years	Grab

The pH shall not be less than 6.5 standard units nor greater than 8.5 standard units and shall be monitored continuously, report range.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: point of discharge.

*See page 4 for detail.

Total Toxic Organics

The term "Total Toxic Organics" (TTO) is the summation of all quantifiable values greater than 0.01 milligrams per liter (mg/l) for the following toxic organics:

Acenaphthene	Acenaphthylene	Naphthalene
Acrolein	Anthracene	Nitrobenzene
Acrylonitrile	1,12-benzoperylene	2-nitrophenol
Benzene	(benzo(ghi)perylene)	4-nitrophenol
Benzidine	Fluorene	2,4-dinitrophenol
Carbon tetrachloride	Phenanthrene	4,6-dinitro-o-cresol
(tetrachloromethane)	1,2,5,6-dibenzanthracene	N-nitrosodimethylamine
Chlorobenzene	(dibenzo(a,b)anthracene)	N-nitrosodiphenylamine
1,2,4-trichlorobenzene	Indeno(1,2,3-cd) pyrene	Trichloroethylene
Hexachlorobenzene	(2,3-o-phenylene pyrene)	Vinyl chloride (chloroethylene)
1,2-dichloroethane	Pyrene	Aldrin
1,1,1-trichloroethane	Tetrachloroethylene	Dieldrin
Hexachloroethane	Toluene	Chlordane (technical mixture and metabolites)
1,1-dichloroethane	1,3-dichlorobenzene	4,4-DDT
1,1,2-trichloroethane	1,4-dichlorobenzene	4,4-DDE (p,p-DDX)
1,1,2,2-tetrachloroethane	3,3-dichlorobenzidine	4,4-DDD (p,p-TDE)
Chloroethane	1,1-dichloroethylene	Alpha-endosulfan
Bis (2-chloroethyl) ether	1,2-trans-dichloroethylene	Beta-endosulfan
2-chloroethyl vinyl ether	2,4-dichlorophenol	Endosulfan sulfate
(mixed)	1,2-dichloropropane	Endrin
2-chloronaphthalene	(1,3-dichloropropene)	Endrin aldehyde
2,4,6-trichlorophenol	2,4-dimethylphenol	Heptachlor
Parachlorometa cresol	2,4-dinitrotoluene	Heptachlor epoxide
Chloroform (trichloromethane)	2,6-dinitrotoluene	(BHC-hexachlorocyclohexane)
2-chlorophenol	1,2-diphenylhydrazine	Alpha-BHC
1,2-dichlorobenzene	Ethylbenzene	Beta-BHC
N-nitrosodi-n-propylamine	Fluoranthene	Gamma-BHC
Pentachlorophenol	4-chlorophenyl phenyl ether	Delta-BHC
Phenol	4-bromophenyl phenyl ether	(PCB-polychlorinated biphenyls)
Bis (2-ethylhexyl) phthalate	Bis (2-chloroisopropyl) ether	PCB-1242 (Arochlor 1242)
Butyl benzyl phthalate	Bis (2-chloroethoxy) methane	PCB-1254 (Arochlor 1254)
Di-n-butyl phthalate	Methylene chloride	PCB-1221 (Arochlor 1221)
Di-n-octyl phthalate	(dichloromethane)	PCB-1232 (Arochlor 1232)
Diethyl phthalate	Methyl chloride	PCB-1248 (Arochlor 1248)
Dimethyl phthalate	(chloromethane)	PCB-1260 (Arochlor 1260)
1,2-benzanthracene	Methyl bromide (bromomethane)	PCB-1016 (Arochlor 1016)
(benzo(a)anthracene)	Bromoform (tribromomethane)	Toxaphene
Benzo(a)pyrene (3,4-benzopyrene)	Dichlorobromomethane	2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD)
3,4-Benzofluoranthene	Chlorodibromomethane	
(benzo(b)fluoranthene)	Hexachlorobutadiene	
11,12-benzofluoranthene	Hexachlorocyclopentadiene	
(benzo(k)fluoranthene)	Isophorene	
Chrysene		

In monitoring for Total Toxic Organics, the permittee need analyze for only those pollutants which would reasonably be expected to be present. The permittee may make the following certification on its monitoring reports in lieu of conducting an analysis: "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitations for total toxic organics (TTO). I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report.

2. All existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Director as soon as they know or have reason to believe:

- a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) One hundred micrograms per liter (100 ug/l);
 - (2) Two hundred micrograms per liter (200 ug/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 ug/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;
 - (3) Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 C.F.R. §122.21(g)(7); or
 - (4) Any other notification level established by the Director in accordance with 40 C.F.R. §122.44(f).
- b. That any activity has occurred or will occur which would result in the discharge, on a non-routine or infrequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) Five hundred micrograms per liter (500 ug/l);
 - (2) One milligram per liter (1 mg/l) for antimony;
 - (3) Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 C.F.R. §122.21(g)(7); or
 - (4) Any other notification level established by the Director in accordance with 40 C.F.R. §122.44(f).
- c. That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the permit application.

C. MONITORING AND REPORTING

1. Reporting

Monitoring results obtained during the previous month shall be summarized for each month and reported on separate Discharge Monitoring Report Form(s) postmarked no later than the 15th day of the month following the completed reporting period. The first report is due on the 15th day of the month following the effective date of the permit.

Signed copies of these, and all other reports required herein, shall be submitted to the Director at the following address:

Permit Compliance Section
Compliance Branch
Water Management Division
Environmental Protection Agency
JFK Federal Building
Boston, MA 02203

Duplicate signed copies of all monitoring reports shall be submitted to the State at:

Massachusetts Department of Environmental Quality Engineering
Massachusetts Division of Water Pollution Control
Southeastern Regional Office
Lakeville Hospital
Lakeville, Massachusetts 02346

Signed copies of all other notifications and reports required by this permit shall be submitted to the State at:

Massachusetts Department of Environmental Quality Engineering
Massachusetts Division of Water Pollution Control
Regulatory Branch
1 Winter Street
Boston, Massachusetts 02108

D. STATE PERMIT CONDITIONS

This Discharge Permit is issued jointly by the U. S. Environmental Protection Agency and the Division of Water Pollution Control under Federal and State law, respectively. As such, all the terms and conditions of this permit are hereby incorporated into and constitute a discharge permit issued by the Director of the Massachusetts Division of Water Pollution Control pursuant to M.G.L. Chap. 21, §43.

Each Agency shall have the independent right to enforce the terms and conditions of this Permit. Any modification, suspension or revocation of this Permit shall be effective only with respect to the Agency taking such action, and shall not affect the validity or status of this Permit as issued by the other Agency, unless and until each Agency has concurred in writing with such modification, suspension or revocation. In the event any portion of this Permit is declared, invalid, illegal or otherwise issued in violation of State law such permit shall remain in full force and effect under Federal law as an NPDES Permit issued by the U. S. Environmental Protection Agency. In the event this Permit is declared invalid, illegal or otherwise issued in violation of Federal law, this Permit shall remain in full force and effect under State law as a Permit issued by the Commonwealth of Massachusetts.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203

FACT SHEET

DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
PERMIT TO DISCHARGE TO WATERS OF THE UNITED STATES

NPDES PERMIT NO.: *MA0005428*

STATE PERMIT NO.:

NAME AND ADDRESS OF APPLICANT:

*Acushnet Company, Golf Division
Stocum Street
Acushnet, Massachusetts*

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

*Acushnet Company
Stocum Street
Acushnet, Mass.*

RECEIVING WATER:

Acushnet River

CLASSIFICATION:

SP

I. Proposed Action, Type of Facility, and Discharge Location.

The above named applicant has applied to the U.S. Environmental Protection Agency for

NPDES permit to discharge into the designated receiving water.

The facility is engaged in *the manufacturing of golf ball.*

The discharge is from consist of treated process water, non-contacting cooling water & sanitary waste.

II. Description of Discharge.

A quantitative description of the discharge in terms of significant effluent parameters based *monitoring report & chemical analysis* is shown on Attachment *11*

Some of the following pages are
illegible

III. Limitations and Conditions.

The effluent limitations of the draft permit, the monitoring requirements, and any implementation schedule (if required) may be found on the following attachments:

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IV. Permit Basis and Explanation of Effluent Limitation Derivation.

The Acushnet Company, 200 State Street, Acushnet, Massachusetts is a manufacturer of golf balls. When the expired permit (76-1-1980) was issued, the permit provided the permittee to allow for the discharge by tie-in to the municipal sewerage treatment system with a degree of its availability. As of to date, the tie-in has not been completed due to various construction problems. The company is working to complete the design, construction and preparation for the tie-in has completed. Until the tie-in take place, the company is discharging its treated process waste, non-contact cooling water, boiler blowdown & sanitary waste direct to the river.

The Clean Water Act as amended (CWA) requires that discharges utilize best technology available (BTA) or secondary treatment. The minimum technology requirements are Best Practicable Control Technology Currently Available (BPT) (Section 301 (b)(1) A of the CWA)

which was required by July 1, 1977; and Best Available Technology Economically Achievable (BAT) for toxic pollutants and Best Conventional Pollutant Control Technology (BCT) for conventional pollutants (Section 301(b)(2)(A) and E) which was required by July 1, 1984. National Effluent Guideline has not been promulgated for this type of discharge. Therefore, the proposed permit is based on Best Professional Judgement (BPJ) as provided in Section 402(a)(1) of the Clean Water Act.

Since the issuance of the last permit, the company was preparing for the tie-in. A pretreatment facility was constructed.

The wastewater collection system consists of a network of gravity piping that collects wastewater discharges from within the manufacturing plant for discharge to the wastewater pretreatment facility. Due to the pretreatment requirements of the town, several major changes were made.

A) Sanitary waste - App. 12,000 gal/day of septic tank overflow is discharged to the river and will connect to the sewer once the tie-in is complete.

B) Process wastewater - 1) Two new cleaners

Brooks boilers replaced an obsolete Babcock & Wilcox boilers and two Dillon boilers in 1982. Boiler blowdown has been reduced to approximately 500 gal/day. Boiler blowdown presently discharged to the river will connect to the sewer when tie-in is completed.

2) Acetone Room Floor Sluicing - Acetone, used for removing balls in preforated cans was eliminated in 1985.

Approximately 10,000 gal/day of floor sluicing was used for fire protection purpose is no longer needed.

3) Painted Ball Stripping - In 1980, two ball stripping solutions were used to dip preforated cans of balls and the solutions were

a) Balata Ball Strip - Potassium Hydroxide, Water & Cellosolve Solvent

b) Surlyn Ball Strip - Methylene chloride, Hydroxyacetic Acid & Phenol

In 1980, approximately 2000 gal/day

of water with Trace Strip components was discharged. The Surlyn ball Strip solution was eliminated in January 1986. Presently, there are app. 300 gal/day of rinse water with Balata ball strip components are discharged to the river and will discharge to the sewer once the sewer is available.

4) Spindle Stripping - Metal spindle fixtures used for holding & rotating balls during painting were stripped with a solution similar to the balata stripper. In 1984, plastic disposable "masks" were adopted and spindles are no longer stripped. App. 1200 gal/day flow of rinse water had been eliminated.

5) Pressure Blasting - App. 180,000 gal/day of rinse water is generated. Abrasive grit used off balls accumulate in the drainage lines, wet well of pump house. To eliminate this problem. The company will install a clarifier

in late 1986 for the solids build up and also enable the plant to recycle the rinse water.

b) Simplified Balata Golf Ball Process-

This process replaces acetone for rinsing balata balls. A daily solution consists of 432 gallons of water, nine gal. of hydrochloric acid, and 4.5 pounds of surfactant.

The acid solution is neutralized with caustic in the treatment system. App. 3400 gal/day of wastewater is generated. Presently, it is discharged to the river but will tie-in to sewer once tie-in is complete.

In addition, a new chiller plant supported by two cooling towers recirculate the non-contact cooling water has eliminated some of the non-contact cooling water discharge. Additional study is underway to install recirculating cooling tower to reuse additional cooling water.

With the above changes, the company is ready for the tie-in until the tie-in take place, the direct discharge must meet the requirements require by the CWA.

The sanitary waste discharge (outfall 008) EPA has not promulgated effluent guideline for sanitary waste from an industrial dischargers. Therefore, the permit limitations are based on Best Professional Judgement. EPA has promulgated secondary treatment for Publicly owned Treatment Works (POTW). This requirements are set forth at 40 CFR Part 133. The regulations describe the secondary treatment requirements for biochemical oxygen demand (BOD), Total Suspended Solids (TSS), and pH. The "Average monthly" BOD and TSS limitations are based on the requirements of 40 CFR 133.102. Numerical "Maximum Daily" limitations and numerical limitations for settleable solids pH and fecal coliform are based on the Commonwealth's state certification requirements under section 401(a)(1) of the CWA, as described in 40 CFR 124.53. Numerical limits for oil & grease is needed to meet the state water quality requirement. EPA has determined that the above requirement are needed to comply with the technology

requirements of the Clean Water Act, cited above (i.e. BPT and BAT). Therefore, the proposed limitations for BOD, TSS, SS & fecal Coliform are based on the secondary treatment requirement.

The process waste discharge (outfall 010)- The discharge from this outfall mainly consist of non-contact cooling water, boiler blowdown & reuse water from different processes. The primary pollutants identified in the latest chemical analyses (2/5/86) are zinc, and solids. The proposed limitations are developed based on monitoring report and the Massachusetts Certification requirement on metals (Zinc). The Total Toxic Organic (TTO) is included in the draft permit to ensure solvent usage had been eliminated during the changes cited above.

In addition to meeting the technology standards, permit limitation must also satisfy section 301(b)(1)(C) of the CWA which requires compliance with State Water Quality Standards. The proposed limitation on pH & oil & grease are included.

as Massachusetts State certification requirements needed to meet Water Quality Standards as required by Section 401(d) of the CWA and 40 C.F.R §§ 124.53 and 124.56

The effluent monitoring requirements have been established to yield data representative of the discharge under authority of Section 308(a) of the CWA.

The remaining conditions of the permit are based on the NPDES regulations Part 122 through 125 and consist primarily of management requirements common to all permits.

V. State Certification Requirements.

EPA may not issue a permit unless the State Water Pollution Control Agency with jurisdiction over the receiving waters certifies that the effluent limitations contained in the permit are stringent enough to assure that the discharge will not cause the receiving water to violate State Water Quality Standards. The staff of the *Massachusetts Division of Water Pollution Control* has reviewed the draft permit and advised EPA that the limitations are adequate to protect water quality. EPA has requested permit certification by the State and expects that the draft permit will be certified.

VI. Comment Period, Hearing Requests, and Procedures for Final Decisions.

All persons, including applicants, who believe any condition of the draft permit is inappropriate must raise all issues and submit all available arguments and all supporting material for their arguments in full by the close of the public comment period, to the U.S. EPA, Compliance Branch, JFK Federal Building, Boston, Massachusetts 02203. Any person, prior to such date, may submit a request in writing for a public hearing to consider the draft permit to EPA and the State Agency. Such requests shall state the nature of the issues proposed to be raised in the hearing. A public hearing may be held after at least thirty days public notice whenever the Regional Administrator finds that response to this notice indicates significant public interest. In reaching a final decision on the draft permit the Regional Administrator will respond to all significant comments and make these responses available to the public at EPA's Boston office.

Following the close of the comment period, and after a public hearing, if such hearing is held, the Regional Administrator will issue a final permit decision and forward a copy of the final decision to the applicant and each person who has submitted written comments or requested notice. Within 30 days following the notice of the final permit decision any interested person may submit a request for a formal hearing to reconsider or contest the final decision. Requests for formal hearings must satisfy the requirements of 40 C.F.R. §124.74, 48 Fed. Reg. 14279-14280 (April 1, 1983).

VII. EPA Contact.

Additional information concerning the draft permit may be obtained between the hours of 9:00 a.m. and 5:00 p.m., Monday through Friday, excluding holidays from:

Kenneth Chin

John F. Kennedy Federal Building
Boston, Massachusetts 02203
Telephone: (617)223-5061

7-25-86
Date

David A. Fierra, Director
Water Management Division
Environmental Protection Agency

ATTACHMENT. A1

Acushnet Company
Client: Titlest Golf Division
P.O. Box B965
New Bedford, MA 02741

Date of Collection: 2/6/86

Date of Analysis: 3/7/86

Sample Description: Composite - Discharge to River

LABORATORY ANALYSIS

Analysis Number	3865
Alkalinity	16.5
Chemical Oxygen Demand	20.4
Chloride	17.5
Color	8
Conductance	86.
Fluoride	.11
Arsenic	< .001
Cadmium	.01
Chromium	< .01
Copper	< .01
Iron	.58
Lead	< .01
Manganese	.06
Mercury	.002
Nickel	< .01
Silver	< .01
Zinc	< .01
Sulfide	< .05

ATTACHMENT A2

Acushnet Company
Client: Titlest Golf Division

Date of Collection: 2/5/86

P.O. Box B965

Date of Analysis: 3/7/86

New Bedford, MA 02741

Sample Description: Composite - Discharge to Sewer

LABORATORY ANALYSIS

Analysis Number	3845
Biochemical Oxygen Demand	170
Chemical Oxygen Demand	69.4
Chloride	17.5
Alkalinity	16.3
Acidity	*
Color	5
Conductance	153.
Fluoride	.30
Arsenic	< .001
Cadmium	.01
Chromium	< .01
Copper	< .01
Iron	.41
Lead	< .01
Manganese	.14
Mercury	.001
Nickel	< .01
Silver	< .01
Zinc	.23

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 008, sanitary waste.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow-m ³ /Day (MGD)	-	-	Continuous	Daily Avg.
BOD	30 mg/l	50 mg/l	Monthly	Composite
TSS	30 mg/l	50 mg/l	Monthly	Composite
Oil & Grease	10 mg/l	15 mg/l	Monthly	Composite
Settleable Solids	-	.3 mg/l	Monthly	Composite
Fecal Coliform	200/100 ml	400/100 ml	Monthly	Grab

The pH shall not be less than 6.5 standard units nor greater than 8.5 standard units and shall be monitored continuously, report ranges.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: point of discharge.

PART I

Page 3 of 7
Permit No. MA0005428

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

2.. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 010 treated process waste, non-contact cooling water and boiler blowdown.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	Avg. Monthly	Max. Daily	Measurement Frequency	Sample Type
Flow-M ³ /Day (MGD)	-	-	Continuous	Daily Avg.
COD	Monitor		Monthly	Composite
Zinc	1.00	2.61	Monthly	Composite
Total Suspended Solids	30 mg/l	50 mg/l	Monthly	Composite
Oil & Grease	10	15	Monthly	Grab
Temperature	-	92°F	Monthly	Grab
*TTO	-	2.13 mg/l	2/Years	Grab

The pH shall not be less than 6.5 standard units nor greater than 8.5 standard units and shall be monitored continuously, report range.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: point of discharge.

*See page 4 for detail.

U.S. v. AVX Original
Litigation Document

**AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM**

In compliance with the provisions of the Federal Water Pollution Control Act, as amended,
(33 U.S.C. 1251 et. seq; the "Act"), and the Massachusetts Clean Waters Act, as
amended, (M.G.L., C.21, §§26-53),

Elen Petroleum Corporation

is authorized to discharge from a facility located at

Fish Island
New Bedford, Massachusetts

to receiving waters named

Acushnet River

in accordance with effluent limitations, monitoring requirements and other conditions set forth
in Parts I, II, and III hereof.

This permit shall become effective 45 days from date of signature.

This permit and the authorization to discharge shall expire at midnight, five years from
effective date.

Signed this 5 day of November, 1979.



Leslie Carothers

Leslie Carothers, Director
Enforcement Division
Environmental Protection Agency



Thomas C. McMahon

Thomas C. McMahon, Director
Division of Water Pollution Control
Commonwealth of Massachusetts

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning effective date and lasting through expiration date
the permittee is authorized to discharge from outfall(s) serial number(s) 001

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>				<u>Monitoring Requirements</u>	
	kg/day (lbs/day)		Other Units (Specify)		Measurement Frequency	Sample Type
	Daily Avg	Daily Max	Daily Avg	Daily Max		
Flow—m ³ /Day (MGD)	—	—	—	—	—	—
Oil & Grease	—	—	—	15 mg/l	4/month*	Grab**

*At least four oil and grease samples of the treatment facility discharge shall be taken each month during two or more storm events. The first of each pair of samples shall be taken within the first hour of rainfall, the second after peak rainfall or after three hours of discharge during the same storm in order to sample initial operation and operation when full.

An additional oil and grease sample shall be taken during any dry weather discharge not related to a storm event.

**Analysis shall be accomplished by the Freon Extraction Method.

The pH shall not be less than 6.5 standard units nor greater than 8.5 standard units unless these values are exceeded due to natural causes. The pH shall be monitored at least once per month by a separate grab sample.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):
Point of discharge

The discharge shall not cause a violation of the water quality standards of the receiving waters.

B. MONITORING AND REPORTING**1. Representative Sampling**

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. Reporting

Monitoring results obtained during the previous 3 months shall be summarized quarterly and reported on a Discharge Monitoring Report Form (OMB#158-R0073), postmarked no later than the 28th day of the month following the completed reporting period. The first report is due on December 28, 1979*. Duplicate signed copies of these, and all other reports required herein, shall be submitted to the Regional Administrator and the State at the following addresses:

Environmental Protection Agency
Region I - Permits Branch
P.O. Box 8127
Boston, MA 02114

Massachusetts Division of Water
Pollution Control
Southeastern Regional Office
P. O. Box 537
North Pembroke, Massachusetts 02358

*Subsequent reports are due March 28, June 28, September 28 and December 28 each year.

3. Definitions

See attached sheets.

~~a. The "daily average" discharge means the total discharge by weight during a calendar month divided by the number of days in the month that the production or commercial facility was operating. Where less than daily sampling is required by this permit, the daily average discharge shall be determined by the summation of all the measured daily discharges by weight divided by the number of days during the calendar month when the measurements were made.~~

~~b. The "daily maximum" discharge means the total discharge by weight during any calendar day.~~

4. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act, under which such procedures may be required.

5. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The exact place, date, and time of sampling;
- b. The dates the analyses were performed;
- c. The person(s) who performed the analyses;

PART I

Page 4 of 8

Permit No. - MA0003301

d. The analytical techniques or methods used; and

e. The results of all required analyses.

6. *Additional Monitoring by Permittee*

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report Form (OMB#158-R0073). Such increased frequency shall also be indicated.

7. *Records Retention*

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the State water pollution control agency.

A. MANAGEMENT REQUIREMENTS**1. *Change in Discharge***

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions, production increases, or process modifications which will result in new, different, or increased discharges of pollutants must be reported by submission of a new NPDES application or, if such changes will not violate the effluent limitations specified in this permit, by notice to the permit issuing authority of such changes. Following such notice, the permit may be modified to specify and limit any pollutants not previously limited.

2. *Noncompliance Notification*

If, for any reason, the permittee does not comply with or will be unable to comply with any daily maximum effluent limitation specified in this permit, the permittee shall provide the Regional Administrator and the State with the following information, in writing, within five (5) days of becoming aware of such condition:

- a. A description of the discharge and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

3. *Facilities Operation*

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

4. *Adverse Impact*

The permittee shall take all reasonable steps to minimize any adverse impact to navigable waters resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

5. *Bypassing*

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except (i) where unavoidable to prevent loss of life or severe property damage, or (ii) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the effluent limitations and prohibitions of this permit. The permittee shall promptly notify the Regional Administrator and the State in writing of each such diversion or bypass.

6. *Removed Substances*

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering navigable waters.

7. *Power Failures*

In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

- a. In accordance with the Schedule of Compliance contained in Part I, provide an alternative power source sufficient to operate the wastewater control facilities;

or, if such alternative power source is not in existence, and no date for its implementation appears in Part I,

- b. Halt, reduce or otherwise control production and/or all discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

B. RESPONSIBILITIES

1. *Right of Entry*

The permittee shall allow the head of the State water pollution control agency, the Regional Administrator, and/or their authorized representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any discharge of pollutants.

2. *Transfer of Ownership or Control*

In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Regional Administrator and the State water pollution control agency.

3. *Availability of Reports*

Except for data determined to be confidential under Section 308 of the Act, all reports prepared in accordance with the terms of this permit shall be available for public

inspection at the offices of the State water pollution control agency and the Regional Administrator. As required by the Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Act.

4. *Permit Modification*

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

- a. Violation of any terms or conditions of this permit;
- b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. *Toxic Pollutants*

Notwithstanding Part II, B-4 above, if a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the Act for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the permittee so notified.

6. *Civil and Criminal Liability*

Except as provided in permit conditions on "Bypassing" (Part II, A-5) and "Power Failures" (Part II, A-7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

7. *Oil and Hazardous Substance Liability*

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Act.

8. *State Laws*

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Act.

9. *Property Rights*

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

10. *Severability*

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

PART III

OTHER REQUIREMENTS

FOR PURPOSES OF THIS PERMIT, THE FOLLOWING TERMS SHALL APPLY.

Daily Average for Concentration (mg/l), Temperature (°F,°C), Turbidity (JTU), and Settleable Solids (ml/l) - The value of a composite sample or the mean value of the analyses of the specified number of samples collected at regular intervals over a normal operating day.

Daily Maximum for Concentration (mg/l), Temperature (°F,°C), Turbidity (JTU), and Settleable Solids (ml/l) - The maximum value of any one grab sample collected in a normal operating day.

Grab Sample - An individual sample collected in a period of less than 15 minutes.

Composite Sample - A sample consisting of a minimum of eight grab samples collected at regular intervals over a normal operating day and combined proportional to flow, or a sample continuously collected proportional to flow over a normal operating day.

Implementation Schedule - An abatement program consisting of:

a. A plan of intended design, construction, and operation of new or modified facilities to treat the effluent; and

b. A timetable setting forth the dates by which all sources of water pollution must be in compliance with the effluent limitations of this permit. This schedule shall include (if appropriate) interim and final dates to accomplish:

- (1) Completion of preliminary plans and engineering report
- (2) Completion of final plans
- (3) Contract award
- (4) Commencement of construction
- (5) Completion of construction and commencement of operation
- (6) Attainment of operational level

The following abbreviations, when used, are defined below.

mg/l	milligrams per liter
ug/l	micrograms per liter
lbs/day	pounds per day
kg/day	kilograms per day
Temp. °C	temperature in degrees Centigrade
Temp. °F	temperature in degrees Fahrenheit
Turb.	turbidity measured in Jackson Candle Units (JTU)

TNFR or TSS	total nonfilterable residue or total suspended solids
BOD	five-day biochemical oxygen demand unless otherwise specified
TKN	total Kjeldahl nitrogen as nitrogen
NH ₃ -N	ammonia nitrogen as nitrogen
Total P	total phosphorus as phosphorus
COD	chemical oxygen demand
TOC	total organic carbon
Surfactant	surface-active agent
pH	a measure of the hydrogen ion concentration
PCB	polychlorinated biphenyl
m ³ /Day	cubic meters per day
MGD	million gallons per day
Oil & Grease	hexane extractable material
Total Coliform	total coliform bacteria
Fecal Coliform	total fecal coliform bacteria
ml	milliliter(s)
ml/l	milliliter(s) per liter
SU	standard units
NO ₃ -N	nitrate nitrogen as nitrogen
NO ₂ -N	nitrite nitrogen as nitrogen
NO ₂ & NO ₃	combined nitrite and nitrate nitrogen as nitrogen
Cl ₂	total residual chlorine

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
APPLICATION FOR PERMIT TO DISCHARGE - SHORT FORM C**

State copy Form Approved 158-R0096 *Recap*

FOR
AGENCY
USE

APPLICATION NUMBER		
M00003301		
DATE RECEIVED		
7/8	1/0	1/6
YEAR	MO.	DAY

To be filed only by persons engaged in manufacturing and mining

Do not attempt to complete this form before reading accompanying instructions
Please print or type

1. Name, address, location, and telephone number of facility producing discharge

A. Name Glen Petroleum Corporation

B. Mailing address

1. Street address Fish Island - Post Office Box #E-732

2. City New Bedford

3. State Massachusetts 02742

4. County Bristol

5. ZIP 02742

C. Location:

1. Street Fish Island

2. City New Bedford

3. County Bristol

4. State Massachusetts

D. Telephone No. 617 996-8271

Area
Code

2. SIC

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(Leave blank)

3. Number of employees 14

If all your waste is discharged into a publicly owned waste treatment facility and to the best of your knowledge you are not required to obtain a discharge permit, proceed to item 4. Otherwise proceed directly to item 5.

4. If you meet the condition stated above, check here ☐ and supply the information asked for below. After completing these items, please complete the date, title, and signature blocks below and return this form to the proper reviewing office without completing the remainder of the form.

A. Name of organization responsible for receiving waste Restrooms only.

B. Facility receiving waste:

1. Name

2. Street address

3. City

4. County

5. State

6. ZIP

5. ☐ Principal product, ☐ Raw material (Check one) Petroleum Products

6. Principal process Distribution of Petroleum Products.

7. Maximum amount of principal product produced or raw material consumed per (Check one)

Basis	Amount							
	1-99	100-199	200-499	500-999	1000-4999	5000-9999	10,000-49,999	50,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
A. Day				N/A				
B. Month				N/A				
C. Year				N/A				

EPA Form 7550-8 (1-73)

Region I Additional Information:

- When did this or when will this discharge begin Unknown (date).
- If this discharge began or will begin after Jan. 1, 1975, when did construction (including contractual obligations) commence (date).

8. Maximum amount of principal product produced or raw material consumed, reported in item 7, above, is measured in (Check one):

A. ☐ pounds B. ☐ tons C. ☐ barrels D. ☐ bushels E. ☐ square feet
F. ☐ gallons G. ☐ pieces or units H. ☐ other, specify N/A

9. (a) Check here if discharge occurs all year ☒, or

(b) Check the month(s) discharge occurs:

1. ☐ January 2. ☐ February 3. ☐ March 4. ☐ April 5. ☐ May 6. ☐ June
7. ☐ July 8. ☐ August 9. ☐ September 10. ☐ October 11. ☐ November 12. ☐ December

(c) Check how many days per week: 1. ☐ 1 2. ☐ 2-3 3. ☐ 4-5 4. ☐ 6-7 **As required due to rainfall.**

10. Types of waste water discharged to surface waters only (check as applicable)

Discharge per operating day	Flow, operating gallons per day					Volume treated before discharging (percent)				
	0.1-999 (1)	1000-4999 (2)	5000-9999 (3)	10,000-49,999 (4)	50,000- or more (5)	None (6)	0.1-29.9 (7)	30-64.9 (8)	65-94.9 (9)	95-100 (10)
A. Sanitary, daily average			N/A							
B. Cooling water, etc. daily average			N/A							
C. Process water, daily average										
D. Maximum per operating day for total discharge (all types)										

See Note:

NOTE: Quantities vary with amount of rainfall.

11. If any of the three types of waste identified in item 9, either treated or untreated, are discharged to places other than surface waters, check below as applicable.

Waste water is discharged to:	Average flow, gallons per operating day				
	0.1-999 (1)	1000-4999 (2)	5000-9999 (3)	10,000-49,999 (4)	50,000 or more (5)
A. Municipal sewer system			N/A		
B. Underground well			N/A		
C. Septic tank			N/A		
D. Evaporation lagoon or pond			N/A		
E. Other, specify			N/A		

12. Number of separate discharge points: A. ☒ 1 B. ☐ 2-3 C. ☐ 4-5 D. ☐ 6 or more

13. Name of receiving water or waters Achusnet River

14. Does your discharge contain or is it possible for your discharge to contain one or more of the following substances added as a result of your operations, activities, or processes: ammonia, cyanide, aluminum, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, zinc, phenols, oil and grease, and chlorine (residual). A. ☐ yes B. ☒ no

I certify that I am familiar with the information contained in the application and that to the best of my knowledge and belief such information is true, complete, and accurate.

Philip K. McCarthy

Printed Name of Person Signing

September 27, 1978

Date Application Signed

Manager of Engineering & Maintenance

Title

Signature of Applicant

18 U.S.C. Section 1001 provides that:

Whoever, in any matter within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals, or covers up by any trick, scheme, or device a material fact, or makes any false, fictitious, or fraudulent statements or representations; or makes or uses any false writing or document knowing same to contain any false, fictitious, or fraudulent statement or entry, shall be fined not more than \$10,000 or imprisoned not more than 5 years, or both.

Alan-

I could not run a printout of City of New Bedford, however the facilities in pink are all the facilities beginning in the title with New Bedford. They are all listed as inactive sources except the one circled in blue.

Diane Castricone
x3526

ACAPAS ALPHA LIST

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[illegible]

ACUSHNET RIVER BASIN REPORT

QL ***** OL

PERMIT NUMBER	FACILITY NAME SHORT	CITY NAME	RECEIVING WATERS	ISSUE DATE	EXPIRE DATE
MA0003301	GLEN PETROLEUM CORP	NEW BEDFORD /C/	ACUSHNET RIVER	11/05/79	11/05/84
MA0003336	TELEDYNE-RODNEY METALS	NEW BEDFORD /C/	ACUSHNET RIVER & BUZZARDS BAY	03/20/78	03/20/83
MA0003379	AEROVOX CORPORATION	NEW BEDFORD /C/	ACUSHNET RIVER C. during one night	11/19/75	06/21/80
MA0003506	BERKSHIRE HATHAWAY	NEW BEDFORD /C/	ACUSHNET RIVER D. Cochran	08/01/79	08/01/84
MA0003913	ACUSHNET CO-RUBBER DIV-PLANT B	NEW BEDFORD /C/	ACUSHNET RIVER no file	11/20/86	11/20/91
MA0004821	REVERE COPPER PRODUCTS, INC.	NEW BEDFORD /C/	ACUSHNET RIVER M. Marsh	12/23/74	12/23/79
MA0005428	ACUSHNET CO-TITLEIST GOLF DIVI	ACUSHNET /T/	ACUSHNET RIVER ✓ J.H. JR - 409	11/20/86	11/20/91
MA0022080	MARITIME TERMINAL INC	NEW BEDFORD /C/	ACUSHNET RIVER J.H. JR. 409	11/15/79	11/15/84
MA0023884	ACUSHNET CAPACITOR CO.	NEW BEDFORD /C/	ACUSHNET RIVER no file		
MA0024341	SKIPPER MOTOR IN INC	FAIRHAVEN /T/	ACUSHNET RIVER ✓	07/03/78	04/30/83
MA0024350	JOHN DUGAN BUICK-PONTIAC INC	NEW BEDFORD /C/	ACUSHNET RIVER J.H. JR 30178		NO PERMIT
MA0026280	ACUSHNET NURSING INC	ACUSHNET /T/	ACUSHNET RIVER Steve Silva JOHN HILL JR 409	03/24/78	04/30/83
MA0027995	ISOTRONICS INC.	NEW BEDFORD /C/	MUNICIPAL STORM DRAIN STEVE SILVA		
MA0029297	TILCON MASSACHUSETTS INC.	ACUSHNET /T/	ACUSHNET RIVER LINGO		
MA0031232	WILMINGTON TECH. PARK LOT V2	WILMINGTON	SHAWSFERN RTVR - N/A		
MA0100765	FAIRHAVEN	FAIRHAVEN /T/	ACUSHNET RIVER J. H. JR RM 409	06/12/84	06/12/89

TOTAL QUICK LOOK PRINT LINES: 16

J.H. JR = JOHN HUTKO JR.

CITY OF NEW BEDFORD

LIMIT ON METAL & PCB

N.BH
BUZZARDS BAY

02/04/87

→ ACUSHNET RIVER BASIN REPORT

PERMIT NUMBER FACILITY NAME SHORT CITY NAME RECEIVING WATERS ISSUE DATE EXPIRE DATE
MA0003930 ✓ CORNELL-DUBILIER ELECTRIC CORP NEW BEDFORD /C/ BUZZARDS BAY-ACUSHNET RIVER 08/14/75 06/01/80

SUB-TOTAL QUICK LOOK PRINT LINES: 1

02/04/87

→ ACUSHNET RIVER BASIN REPORT

PERMIT NUMBER FACILITY NAME SHORT CITY NAME RECEIVING WATERS ISSUE DATE EXPIRE DATE
MA0004910 ✓ COMMONWEALTH ELECTRIC - CANNON NEW BEDFORD /C/ NEW BEDFORD HBR 06/29/84 06/29/89

02/04/87

ACUSHNET RIVER BASIN REPORT

PERMIT NUMBER FACILITY NAME SHORT CITY NAME RECEIVING WATERS ISSUE DATE EXPIRE DATE
MA0005606 ✓ GOODYEAR TIRE & RUBBER CO. NEW BEDFORD /C/ BUZZARDS BAY VIA CLARKS COVE 08/05/86 08/05/91

02/04/87

ACUSHNET RIVER BASIN REPORT

PERMIT NUMBER FACILITY NAME SHORT CITY NAME RECEIVING WATERS ISSUE DATE EXPIRE DATE
MA0005916 WOODS HOLE OCEAN INST-ENVIR LA FALMOUTH /T/ VINEYARD SOUND 03/03/78 03/31/83

02/04/87

ACUSHNET RIVER BASIN REPORT

PERMIT NUMBER FACILITY NAME SHORT CITY NAME RECEIVING WATERS ISSUE DATE EXPIRE DATE
MA00090182 NATL MARINE FISHERIES-AQUARIUM WOODS HOLE GREAT HARBOR 09/28/79 09/28/84

02/04/87

ACUSHNET RIVER IN REPORT

PERMIT NUMBER FACILITY NAME SHORT CITY NAME RECEIVING WATERS ISSUE DATE EXPIRE DATE
MA00090182 NATL MARINE FISHERIES-AQUARIUM WOODS HOLE GREAT HARBOR 09/28/79 09/28/84

SHORE

PERMIT NUMBER FA(

MA0100030

MARION /T/

AUCOOT COVE

06/02/82

06/02/87

PAGE: 7

02/04/87

ACUSHNET RIVER BASIN REPORT

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PERMIT NUMBER FACILITY NAME SHORT

MA0100781 NEW BEDFORD WTP

CITY NAME

NEW BEDFORD /C/

RECEIVING WATERS

BUZZARDS BAY-ACUSHNET RIVER

ISSUE DATE EXPIRE DATE

11/17/86 12/16/91

PAGE: 8

02/04/87

ACUSHNET RIVER BASIN REPORT

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PERMIT NUMBER FACILITY NAME SHORT

MA0101605 DARTMOUTH WPCF

CITY NAME

DARTMOUTH /T/

RECEIVING WATERS

BUZZARD'S BAY

ISSUE DATE EXPIRE DATE

12/07/84 12/07/89

PAGE: 9

02/04/87

ACUSHNET RIVER BASIN REPORT

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PERMIT NUMBER FACILITY NAME SHORT

MA0101729 FALMOUTH

CITY NAME

FALMOUTH

RECEIVING WATERS

GREAT HARBOR - VINEYARD SOUND

ISSUE DATE EXPIRE DATE

10/24/75 07/01/77

SUB-TOTAL QUICK LOOK PRINT LINES: 1

Hans-Peter Krahn
Hazardous Waste Specialist

261 Commercial Street/P.O. Box 7050
Portland, Maine 04112
(207) 775-5401 Telex 94-4329

ENGINEERS &
SCIENTISTS

Hans-Peter Krahn
Hazardous Waste Specialist

E.C. JORDAN CO. ENGINEERS &
SCIENTISTS

261 Commercial Street/P.O. Box 7050
Portland, Maine 04112
(207) 775-5401 Telex 94-4329
